Civil Rights Requirements

• Entities that receive grants or other types of financial assistance from DHS/FEMA must comply with applicable civil rights authorities.

• When a recipient provides programs and services, and carries out activities, it cannot discriminate against the program beneficiaries based on race, color, national origin (including language), disability, age, sex, or religion.
NEW! DHS Civil Rights Evaluation Tool

DEPARTMENT OF HOMELAND SECURITY
CIVIL RIGHTS EVALUATION TOOL
OMU Control No. 1601-0024
Expiration Date 01/31/2023

Section 1: Instructions

Entities selected to receive a grant, cooperative agreement, or other award of Federal financial assistance from the U.S. Department of Homeland Security (DHS) or one of its Components must complete and submit receipt data within thirty (30) days of receipt of the Notice of Award or, for State Administering Agencies, thirty (30) days from receipt of this form from DHS or its awarding component. Recipients are required to provide this information every other (2) years, not every time a grant is awarded.

Submit the completed form, including supporting materials, to CivilRightsEvaluation@hq.dhs.gov. This form clarifies the recipient’s civil rights obligations and related reporting requirements contained in the DHS Standard Terms and Conditions.

For recipients who have previously submitted this form in the last two (2) years, if the information provided in response to any of the items below has not changed since the last submission, and there are no additional updates, please indicate "no change" under each applicable item; don’t re-submit information previously submitted.

Subrecipients are not required to complete and submit this form to DHS. However, subrecipients have the same obligations as their primary recipients to comply with applicable civil rights requirements and should follow their primary recipient’s instructions for submitting civil rights information to those recipients.

Section 2: Organization Information

Organization Name: [Unique Entity Identifier]
Address (Street, City, State, Zip Code):
Contact Person / Title:
Email / Telephone:
Grant Agreement Number:
Federal Award Identification Number:

Section 3: Civil Rights Requirements

As a condition of receipt of Federal financial assistance, the recipient is required to comply with applicable provisions of laws and policies prohibiting discrimination, including but not limited to:
- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin (including limited English proficiency).
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability.
- Title IX of the Education Amendments Act of 1972, which prohibits discrimination based on sex in education programs or activities.
- Age Discrimination Act of 1975, which prohibits discrimination based on age.

Section 4: Required Information

1. Provide the total number of complaints or lawsuits against the recipient during the past three (3) years alleging discrimination on the basis of race, color or national origin, (including limited English proficiency), sex, age, disability, religion, or alleging retaliation. For each complaint or lawsuit, state the following:
   a. Employment or non-employment related;
   b. Basis (race, color, national origin, including limited English proficiency, sex, age, disability, religion, or alleging retaliation); and
   c. Status (pending, closed with findings, closed with no findings).
   Additionally, if a court or administrative agency made a finding of discrimination in a non-employment complaint for the above three (3) years, forward a copy of the complaint and findings to DHS.
   Responses should not include personally identifiable information (PIIs) that is outside of public record. PII is any information that permits the identity of an individual to be directly or indirectly inferred, including any information which is limited or linkable to an individual.

2. Provide a brief description of any civil rights compliance reviews regarding the recipient conducted during the (2) year period before this award of DHS Federal financial assistance.

3. Provide a statement affirming that staff has been designated to coordinate and carry out the responsibilities for compliance with civil rights laws, and a description of the responsibilities of any such staff.

4. Provide a copy of the recipient’s nondiscrimination policy statement referencing the laws and regulations in Section 3.

5. Provide a copy of the recipient’s discrimination complaints process.

6. Provide a copy of the recipient’s plan to ensure compliance in subrecipient programs (only applies to state administering agencies and other recipients that provide assistance to subrecipients). The plan should describe the process for conducting reviews of subrecipients.

7. Provide copies of the recipient’s policy and procedures used to ensure nondiscrimination and equal opportunity for persons with disabilities to participate in and benefit from the recipient’s programs and services.

8. Provide copies of the recipient’s policy and procedures regarding the requirement to provide meaningful access to programs and services to individuals with limited English proficiency (LEP).

Section 5: Additional Information

Resources for recipients related to the above requirements: http://dhs.gov/resources-recipients-dhs-financial-assistance

For questions and assistance with this form, please contact:
DHS Office for Civil Rights and Civil Liberties
Email: CivilRightsEvaluation@hq.dhs.gov
Phone: (202) 431-1874
Toll Free: 1-866-644-0360
TTY: 202-401-0470
Toll Free TTY: 1-866-644-0361
Federal Emergency Management Agency, Office of Equal Rights (for FEMA recipients):
Email: fema-olv.rights-form@fema.dhs.gov
Phone: (202) 646-0309

Paperwork Reduction Act

The public reporting burden to complete this information collection is estimated at 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collected information. The collection of information is mandatory. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number and expiration date. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:
ATTN: PRA (OMB Control No. 1601-NEW)
Office for Civil Rights and Civil Liberties
U.S. Department of Homeland Security
Building 410, Mail Stop #0150
Washington, D.C. 20528

OMB Form 3057 - Page 2 of 2
DHS Civil Rights Evaluation Tool

Purpose:

• To remind recipients of important civil rights requirements
• To assist recipients in meeting their obligations
• To connect recipients with resources and technical assistance as needed to ensure compliance
DHS Civil Rights Evaluation Tool

Implementation:

• Primary recipients will complete the form and submit to DHS within 30 days of award. Subrecipients are not required to complete the form.

• Recipients will provide the information once every two years, not every time a grant is awarded.

• DHS will provide technical assistance and resources to recipients to address gaps and operationalize requirements.
DHS Civil Rights Evaluation Tool

Required Information:

• Overview of Civil Rights Complaints
• Compliance Reviews (if applicable)
• Responsible Staff
• Nondiscrimination Policy
• Discrimination Complaints Process
• Subrecipient Compliance Plan (if applicable)
• Disability Access and Language Access Policy & Procedures
Contact Us

For questions or technical assistance on meeting your civil rights obligations, please contact:

- DHS Office for Civil Rights and Civil Liberties (CRCL)
  Email: CivilRightsEvaluation@hq.dhs.dhs.gov
  Website: https://www.dhs.gov/resources-recipients-dhs-financial-assistance
The **goal** of SAFER is to assist local fire departments with staffing and deployment capabilities in order to respond to emergencies, and assure that communities have adequate protection from fire and fire-related hazards.
FY 2017 SAFER Funding

- Application opened March 26, 2018 at 8:00am ET
- Application will close on April 27, 2018 at 5:00pm ET
- $345 million available in funding
- Approximately 300 awards
- All awards will be announced by September 30, 2018
- Additional funding details can be found in the FY 2017 Notice of Funding Opportunity (NOFO)
SAFER Activities

SAFER is composed of two activities:

• Hiring of Firefighters
  – Career, combination, and volunteer fire departments are eligible to apply (interest orgs cannot apply)

• Recruitment and Retention (R&R) of Volunteer Firefighters
  – Combination fire departments, volunteer fire departments, and national, state, local, or federally recognized tribal organizations that represent the interests of volunteer firefighters are eligible to apply (career fire departments cannot apply)

• If you want to apply for both activities, you will need to submit two separate applications
SAFER Hiring Grants
Hiring - Priorities

- FEMA prioritizes bringing non-compliant (NFPA 1710 or 1720) departments into compliance in the most cost-effective manner.
- Applications resulting in the largest percentage increases in compliance with NFPA 1710 or 1720 receive higher consideration:
  - NFPA 1710 Assembly Requirements (Section 5.2.4.1 – Single-Family Dwelling Initial Full Alarm Assignment Capability)
  - NFPA 1720 Assembly Requirements (Section 4.3 – Staffing and Deployment)
Hiring – Only New Hires

• Grant funds may only be used to hire **new, additional firefighters**
  – No more “Rehire,” “Retention,” and “Attrition”
  – Above and beyond current budgeted staffing levels
  – Hired after the date of grant award

• Grant funds only cover salary and benefits (actual payroll costs) for SAFER positions
  – “Benefits” defined on page 27 of the NOFO and 2 CFR § 200.431

• Only full-time positions are eligible
  – Full-time positions are those scheduled for at least 2,080 hours per year (e.g., 40 hours per week, 52 weeks per year).
  – You may apply to job-share a position
Hiring – Only New Hires

- The primary assignment (more than 50 percent of time) of all SAFER-funded positions must be on an operational fire suppression vehicle, regardless of collateral duties.
- Grant funds may not be used to supplant funds that would otherwise be available from State or local sources, or the Bureau of Indian Affairs.
  - For example: budget is for 55 positions but only have 50 filled and you want to apply for 5 positions; you must fill to the level of 55 and then hire the 5 SAFER positions for a total of 60 operational positions.
  - You can apply to waive this requirement
• NEW! Costs to provide specialized training to recognize individuals who have mental illness and how to properly intervene with individuals with mental illness, including strategies for verbal de-escalation of crisis.

• Must be applied for with a SAFER hiring grant
  – Will not be awarded on its own

• Can only be used for training
  – Cannot be used for salary and benefits

• Cannot be currently covered by the departments budget
Hiring – Ineligible Costs

- Full-time firefighters employed at time of awards
- Costs to train and equip firefighters (i.e. Personal Protective Equipment (PPE)/Turnout Gear)
  - Does not include the additional funding for specialized training for mental illness
  - Does not include salary and benefits while in training
- Costs associated with hiring
  - Background checks
  - Physicals
- See page 39 of NOFO for full list of ineligible costs
Hiring – Period of Performance (POP)

- POP is 3 years
- 180-day recruitment period after grant is approved for award
- POP automatically starts after the recruitment period
- You can only charge the grant for firefighter salary and benefits incurred within the POP
- If you hire within the 180-day period, you can request to start the grant POP early through amendment
- No extensions to the POP will be permitted
- Only apply for the number of positions that you can hire and start training on or before the start of the POP
• Recipients of Hiring grants are required to contribute non-federal funds through:
  – Position Cost Limit (no waiver available) **and**
  – Cost Share (waiver available)

• Ensure the department, governing body, finance department, etc. are thoroughly familiar with the position cost limit and cost sharing requirements identified on pages 6 – 8 of the NOFO
Federal funds will be limited to:

- In the first year of the grant, 75 percent of the *usual annual cost* of a first-year (i.e., entry-level) firefighter in that department at the time the grant application was submitted.

- In the second year of the grant, 75 percent of the *usual annual cost* of a first-year (i.e., entry-level) firefighter in that department at the time the grant application was submitted.

- In the third year of the grant, 35 percent of the *usual annual cost* of a first-year (i.e., entry-level) firefighter in that department at the time the grant application was submitted.
“Usual annual costs” includes:

- base salary (exclusive of overtime)
- standard benefits package (including the *average* health cost, dental, vision, FICA, life insurance, retirement/pension, etc.) offered by fire departments to first-year (i.e., entry-level) firefighters
- Reference Appendix B on pages 27 – 47 of the NOFO

**Single vs. Family Benefit plan**

- Difference in plans will affect the overall award amount
Hiring – Position Cost Limit Example

- At the time the application is submitted, the usual annual cost of one first year (i.e. entry-level) firefighter in your department is $100,000
- The **MAXIMUM** federal funding you will receive per position, per year is:
  - Year 1 = $75,000
  - Year 2 = $75,000
  - Year 3 = $35,000
- The Position Cost Limit is automatically calculated by the eGrants system in the Budget section of the application
Hiring – Cost Share (Waiver Available)

- Cost Share is based on payment requests for salary and benefits
- The Federal funds received cannot exceed:
  - 75% of the actual (payroll) costs incurred in year 1
  - 75% of the actual (payroll) costs incurred in year 2
  - 35% of the actual (payroll) costs incurred in year 3
- Remember that the Position Cost Limit and the Cost Share requirements overlap
  - Waiving the Cost Share does not waive the Position Cost Limit
  - You will always be limited by the Position Cost Limit per position, per year regardless of the total annual salary and benefits
Hiring – Cost Share Example

• Remember in our example the Position Cost Limit was $75,000, $75,000, and $35,000 in years 1, 2, and 3 respectively.

• The grant is awarded and the department accrues the following **actual costs**:
  – Year 1 = $80,000
  – Year 2 = $95,000
  – Year 3 = $110,000

• If the **cost share is not waived**, the federal portion will be limited to:
  – $60,000 in year 1 (less than the Position Cost Limit)
  – $71,250 in year 2 (less than the Position Cost Limit)
  – $35,000 in year 3 (because of the Position Cost Limit)

• If the **cost share is waived**, the federal portion would be $75,000, $75,000, and $35,000 (because of the Position Cost Limit)
At the time of application, the applicant’s budget for fire-related programs and emergency response must not be below 80 percent of the applicant’s average funding level in the 3 years prior to November 24, 2003.

- What was your department's operating budget (e.g., personnel, maintenance of apparatus, equipment, and facilities; utility costs; purchasing expendable items, etc.) for 2001, 2002, and 2003 fiscal years?

Applicants experiencing economic hardship may apply for a waiver of this requirement.
Applicants experiencing economic hardship may apply to waive or reduce:
- Cost Share requirement
- Minimum budget requirement
- Restriction on supplanting

You may apply to waive one, two, or all three of these requirements.

Must indicate your interest in a waiver within the application and we will provide you with more instructions about how to submit the waiver.

Read the Information Bulletin (IB) 427 posted to:
https://www.fema.gov/media-library/assets/documents/160035
Hiring – Request Details

Add Budget Item

Please provide the following information.

As a reminder, only new, additional firefighters are eligible for funding. Grant funds can no longer be used for the purpose of retaining firefighters currently employed who are facing imminent layoffs.

Note: Fields marked with an asterisk (*) are required.

As you are aware, grants awarded under the Hiring of Firefighters Activity require grantees to maintain their staffing levels and incur no lay-off during the period of performance of the grant. Therefore, it is imperative that your department have the support of your governing body.

In order to ensure that there is a clear understanding of the long-term obligations of a SAFER grant and that, if awarded, all parties involved are committed to fulfilling those requirements upon acceptance of the award, we are requesting a letter from your governing body stating their commitment of the above requirement.

The letter should be prepared on your governing body’s letterhead and addressed to:

Catherine Patterson, Branch Chief
Assistance to Firefighters Grants Branch

If you have received the letter, you may attach it here. (Note: only .doc and .pdf files will be accepted)

If you do not have the letter at this time, you may submit a signed copy of the letter as soon as you are able via fax to 1-866-274-0542 or via e-mail to firegrants@fema.dhs.gov.

* How many full-time firefighter positions, including positions that will be job-shared, are you requesting?

* Full-time is considered 2,080 hours or more worked per year and entitles the employee to receive benefits earned by the other full-time employees in the organization. "Job-share" is the term used to describe the hiring of more than one person to fill one full-time position. Part-time positions are less than 2,080 hours per year. Often part-time employees do not earn benefits or do not earn them at the same rate or level as full-time employees.

If you are requesting to fund a full-time position(s) that will be "job-shared" by more than one individual please indicate how many individuals will fill that position, how they will be used and scheduled to fill the position(s), and provide an explanation as to why the position will be shared. (800 characters)

* What are the current usual annual costs of a first-year firefighter in your department?

* "Usual annual costs" include base salary and the typical benefits package offered to a first-year firefighter.

* What costs are included in the typical benefits package your department provides to first-year firefighters? Please provide details on the dollar amounts or percentages for each benefit being provided. (800 characters)

* Annual Salary: $ 55,000

* Annual Benefits: $ 35,000

* Standard benefits package (including the average health cost, dental, vision, FICA, life insurance, retirement/pension, etc.) offered by fire departments to firefighters.
### Hiring – Request Details

**Request Details**

Click Add Budget Item to begin building the Request Details.

The details of the request will be listed in the table below. Only whole dollar amounts should be provided (no cents please).

Once you have added your request for firefighters, you will have the option to apply for additional funding to provide specialized training to paramedics, emergency medical service workers, and first responders to recognize individuals who have mental illness and how to properly intervene with individuals with mental illness, including strategies for verbal de-escalation of crisis. To request Additional Funding, select "Update" under the action column for SAFER Hiring Additional Funding.

You can come back and modify this area at any point before you submit your application to FEMA.

You may update or delete the information by clicking the appropriate link under the Action column.

When you have finished, press the Return to Summary button below.

* In cases of demonstrated economic hardship, and upon the request of the grant applicant, the FEMA Administrator may waive or reduce a SAFER Hiring grant recipient's cost share requirement, the minimum budget requirement, and/or the restriction on supplanting. Is it your department's intent to apply for any of the available waivers?

#### If yes, which type of waiver will you be applying for?

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<th>Action</th>
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<tbody>
<tr>
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<table>
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<td>Annual Benefits</td>
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<td>Total</td>
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<td>300,000</td>
<td></td>
</tr>
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</table>

Overall total for budget line item: 300,000

SAFER Hiring Additional Funding: Update

Total Funding Requested: 300,000
Hiring — Budget Page

**Budget**

**Hiring of Firefighters:**

There is a three-year period of performance for grants awarded under the Hiring of Firefighters Activity. The amount of Federal funding provided to a recipient for hiring a firefighter in any fiscal year may not exceed:

- Year One: 75 percent of the usual annual cost of a first-year firefighter as provided in the Request Details section;
- Year Two: 75 percent of the usual annual cost of a first-year firefighter as provided in the Request Details section;
- Year Three: 35 percent of the usual annual cost of a first-year firefighter as provided in the Request Details section.

The additional funds requested for training are not subject to the funding limitations above. However, the costs may only be used to provide training and cannot be used toward the salary and benefits of requested firefighters. Costs for training must be expended within the three-year period of performance.

Review and confirm the budget information below. If you need to change any of the budget amounts on the matrix, you will need to update the information on the previous Request Details screen.

When you are finished, press the *Save and Continue* button below.

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<th>Budget Matrix</th>
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<th>Second 12-Month Period</th>
<th>Third 12-Month Period</th>
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<td>35,000</td>
<td>185,000</td>
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Hiring – After Award Requirements

- No lay-offs permitted during period of performance
- Operational staffing levels must be maintained at the level that existed at the time of award, in addition to SAFER-funded positions
  - Applies to all 3 years of the grant period of performance
  - Must take active and timely steps to backfill any operational vacancies
  - Ensure governing body or whoever has the hiring authority is aware of requirement
- No obligation to retain the SAFER-funded positions after POP ends
Hiring – IMPORTANT REMINDERS

• Only full-time positions will be funded
  – Scheduled for at least 2,080 hours per year (e.g., 40 hours per week, 52 weeks per year)

• The primary assignment (more than 50 percent of time) of all SAFER-funded positions must be on an operational fire suppression vehicle, regardless of collateral duties.

• Only salary and benefits incurred during 3-year POP are eligible for reimbursement
  – If you hire prior to start of POP you can request to start POP early ONLY if you have hired all SAFER-funded positions
Hiring – IMPORTANT REMINDERS

- No extensions to the period of performance (POP) allowed
- Only apply for the number of positions that you can hire and start training on or before the start of the POP
- Ensure you have the support of your governing body before applying! A letter from the governing body will be requested at time of application.
- Ensure that all parties involved (i.e., governing body, finance department, etc.) are aware of the requirements and long-term obligations of the grant
  - Position Cost Limit and Cost Share; Maintaining operational staffing
PHASE 1: Computer will score all complete and eligible applications

- Answers to activity-specific questions as well as information submitted under the Department Characteristics section of the application will determine an application’s standing relative to stated priorities
- Applications most consistent with the SAFER grant funding priorities score higher in the automated (pre-score) evaluation.

PHASE 2: Panel of peer reviewers score the Narrative Statement and make funding recommendations

Each phase is 50% of total score
• Technical Review
  – FEMA conducts technical reviews of the highest-scoring applications, including evaluation of project budgets to determine if costs are reasonable

• Referral for Award
  – Applications are rank-ordered starting with the highest-scoring application and combined with the statutory allocation requirements
  – Applications are sent to FEMA award administration, which conducts additional review
How to Apply

• Submit the application in the eGrants System at https://portal.fema.gov
  – Use the same username and password that you used for any Assistance to Firefighters Grant Programs (AFGP) applications previously submitted
    • If you are not sure, call the Help Desk at 1-866-274-0960.
    • Do NOT create a new username.
    • Passwords cannot contain special characters (@, !, #, etc.)
      – You will need to change your password if it contains special characters
    • If your username has the @ symbol, you may have issues applying. Contact the help desk if you experience issues; do not start a new application if you have already started one

• Access eGrants only through Internet Explorer (IE 6 or higher)

• Have only one browser tab open when entering information
Application Tips

• Do not wait!

• Double and triple check information being submitted
  – Work with finance or other departments in your organization to ensure all facts and figures are accurate throughout the entire application
  – If you included any "filler" or placeholder text while filling out your application, update the application fields with your final and complete answers
  – Once the application has been submitted, it cannot be changed

• Register or update your SAM registration at http://www.sam.gov
  – SAM registration is only active for one year and must be renewed annually
  – Applications cannot be awarded if SAM is not active
Application Tips

- Review FY 2017 SAFER Technical Assistance Tools
  - Notice of Funding Opportunity (NOFO)
  - Frequently Asked Questions (FAQs)
  - Applicant Checklist
- Use the Self-Evaluation Sheets
  - Developed to help you understand the criteria that you must address in your Narrative Statement
  - The Peer Reviewers will use these to score your application

https://www.fema.gov/media-library/assets/documents/160035
Application Resources

- **SAFER Program Help Desk**
  - 1-866-274-0960 or via email at firegrants@fema.dhs.gov
  - Help Desk is open Monday through Friday from 8:00 a.m. to 4:30 p.m. ET

- **SAFER Program Officers**
  - Julia.Barron@fema.dhs.gov 202-786-0929
  - Yesenia.Diaz@fema.dhs.gov 202-212-7314
  - Tina.Godfrey@fema.dhs.gov 202-786-9785
  - Naomi.Johnson@fema.dhs.gov 202-786-9981
  - Danielle.Shelton@fema.dhs.gov 202-786-0819
  - Jessica.Geraci@fema.dhs.gov 202-377-9548
Questions?

Thank you!