



GRANT PROGRAMS DIRECTORATE POLICY

- I. **TITLE:** Review and Approval Requirements for Training Courses Funded Through Preparedness Grants
- II. **DATE OF ISSUANCE:** September 10, 2013
- III. **POLICY STATEMENT:** With the exception of Countering Violent Extremism (CVE) courses, States, territories, tribal entities and urban areas are no longer required to submit grant funded non-FEMA courses to the National Training and Education Division (NTED) for review under the current course review and approval process.
- IV. **PURPOSE:** The purpose of this policy is to communicate the decision to retroactively apply the policies set forth in applicable Fiscal Year (FY) 2012 Preparedness Grant Program Funding Opportunity Announcements (FOAs) regarding training course approval requirements (i.e., the “three for free” rule) and the conditions for personnel attending non-FEMA approved training.
- V. **SCOPE AND EXTERNAL AUDIENCE:** This retroactive provision shall apply to all open awards issued under the grant programs cited under the Grant Programs Directorate’s (GPD) Information Bulletin #379 titled *Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding* issued on February 17, 2012.
- VI. **AUTHORITY:** The review and approval requirements for courses funded through preparedness grants and governed by the following authorities, except where otherwise prohibited by law:
 - A. 44 CFR, Emergency Management and Assistance, which includes 44 CFR Part 13.22, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments.
 - B. GPD Information Bulletin #379, Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding, issued February 17, 2012.



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VII. OBJECTIVES: While FEMA preparedness program grantees are encouraged to select training courses that have been approved by the NTED and listed in the NTED Approved State and Federal Sponsored Course Catalog (or in the case of PSGP grantees, approved by the Maritime Administration), preparedness funds may be used to support the delivery and attendance of non-FEMA training courses. This policy clarifies the applicable program requirements. The provision outlined in this document supports the Department of Homeland Security's *Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding*, issued on February 13, 2012.

VIII. DEFINITIONS, ABBREVIATIONS, AND FORMATTING:

A. Definitions

- 1) **Funding Opportunity Announcement** means a publicly available document by which a Federal agency makes known its intentions to award discretionary grants or cooperative agreements, usually as a result of competition for funds. Funding opportunity announcements may be known as program announcements, notices of funding availability, solicitations, or other names depending on the agency and type of program. Funding opportunity announcements can be found at Grants.gov/FIND and on the funding agency's or program's Web site

B. Abbreviations

- 1) **FOA:** Funding Opportunity Announcement
- 2) **IJ:** Investment Justification
- 3) **PPD-8:** Presidential Policy Directive 8: National Preparedness
- 4) **NTED:** National Training and Education Division



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- 5) **SAA:** State Administrative Agency
- 6) **TPOC:** Training Point of Contact
- 7) **EOP:** Emergency Operations Plan
- 8) **MARAD:** Maritime Administration
- 9) **HSGP:** Homeland Security Grant Program
- 10) **EMPG:** Emergency Management Performance Grant Program
- 11) **PSGP:** Port Security Grant Program
- 12) **SHSP:** State Homeland Security Program
- 13) **UASI:** Urban Areas Security Initiative
- 14) **OPSG:** Operation Stonegarden

IX. POLICY DETAILS: Effective immediately, and with the exception of CVE courses, states, territories, tribal entities and urban areas are no longer required to submit grant-funded, non-FEMA courses to NTED for review under the current course review and approval process. In previous years, FEMA funding guidance and/or FOAs stated that the SAA/TPOC was allowed three deliveries of the same course within a state/territory before the non-FEMA training course curriculum was required to go through the NTED State Course Review and Approval Process. *Although the current State Course Review and Approval Process is still available to any state, there is no longer a requirement to submit a course for review after three deliveries.*

Further, states, territories, tribal entities and urban areas are no longer required to request approval from FEMA for personnel to attend non-FEMA training as long as the training is coordinated with and approved by the State Administrative



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Agency (SAA) state/territory or Training Point of Contact (TPOC) and falls within the FEMA mission scope and the jurisdiction's Emergency Operations Plan (EOP).

States, territories, tribal entities, and urban areas are required, within 30 days after attendance, to submit information through the SAA or TPOC via Web-Forms (<https://www.firstrespondertraining.gov/admin/menuAction.do?forwardToPage=webforms/index.asp>) on all training supported with HSGP and EMPG 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. States, territories, tribal entities, and urban areas intending to use FEMA funds to support attendance at training not provided by FEMA must ensure these courses:

- A. Fall within the FEMA mission scope to prepare state, local, tribal, and territorial personnel to prevent, protect against, mitigate, respond to, and recover from acts of terrorism and catastrophic events;
- B. Build capabilities that: (a) support a specific training need identified by the state, territory, tribal entities, and urban areas, and (b) comport with the state, territory, or urban area's Homeland Security Strategy;
- C. Address specific tasks and/or competencies articulated in FEMA's *Emergency Responder Guidelines and the Homeland Security Guidelines for Prevention and Deterrence*;
- D. Address specific core capabilities articulated in the National Preparedness Goal;
- E. Support the specific program training activities identified in the individual HSGP grant programs (SHSP, UASI, and OPSG) for which the funding will be used; and



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- F. Comply with FEMA GPD Information Bulletin #373 *Ensuring Training on Counter Terrorism and Countering Violent Extremism* is consistent with United States Government (USG) and DHS Policy.

FEMA will continue to conduct periodic reviews of all state, territory, and urban areas' training funded by FEMA. These reviews may include requests for all course materials and physical observation of, or participation in, the funded training. Grantees are advised that if these reviews determine that attended courses are outside the scope of this guidance, grantees could be required to repay grant funds expended for those courses.

Exemptions

Countering Violent Extremism (CVE) training courses and courses related to countering violent extremism are exempted from this policy. Further, states, territories, tribal entities and urban areas are required to submit grant-funded, non-FEMA CVE courses to NTED for review under the current course review and approval process after three (3) deliveries. This will be done to ensure that the training aligns with the federal approach to CVE, including prioritizing civil rights and civil liberties and building partnerships with communities.

Training Requirements Specific to PSGP

Funding for non-FEMA training courses may be permitted on a case-by-case basis depending on the specific training needs of the eligible PSGP applicant. In such cases, the applicant will be required to explain in the Investment Justification (IJ) why none of the approved courses satisfy the identified training need and must submit detailed course information for review and consideration by the local field review team and the National Review Panel. The IJ must also provide assurance that the requested course:

- A. falls 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;



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- B. Builds additional capabilities that support a specific training need identified by the Port-Wide Risk Mitigation Plan (if applicable), Area Maritime Security Plan, Area Maritime Security Committee, or Coast Guard Captain of the Port;
- C. addresses specific tasks and/or competencies articulated in FEMA's *Emergency Responder Guidelines* and the *Homeland Security Guidelines for Prevention and Deterrence*;
- D. Addresses specific capabilities articulated in the core capabilities identified in the National Preparedness Goal; and
- E. Supports PSGP priorities.

Training Resources

The NTED Course Catalog provides valuable information about NTED's training courses and training providers, including course prerequisites and how to schedule and attend courses. Also available are catalogs of all state-sponsored and federal-sponsored courses that fall within the NTED mission scope, and have been approved through the NTED course review and approval process. The NTED catalogs may be viewed at the <http://www.firstrespondertraining.gov> website and the MARAD approved courses at:

http://www.marad.dot.gov/education_landing_page/mtsa_course_certification/mtsa.htm).

- X. **MONITORING AND EVALUATION:** The Grant Programs Directorate (GPD) will ensure compliance with this policy through its annual financial and programmatic monitoring program. FEMA preparedness grantees and sub-grantees that fail to comply with this policy may not receive reimbursement through the applicable grant program.
- XI. **RESPONSIBLE OFFICE:** FEMA Grant Programs Directorate
- XII. **SUPERSESSION:** This policy supersedes guidance contained in the FY 2008, 2009, 2010 and 2011 HSGP Guidance and Application Kits which states "In support of the



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continuing efforts to build common catalogs of approved training not provided by FEMA, the SAA/TPOC will be allowed three deliveries of the same course within a state/territory before the course is required to go through the FEMA State course review and approval process. Additional course deliveries will be authorized during the review period. However, if the course is disapproved as part of the process, no additional FEMA funds can be dedicated to attending the course,” and further, the policy conforms to the guidance issued within the FY 2012 HSGP FOA and applies it retroactively for applicable open awards.

- XIII. REVIEW DATE:** This policy expires 3 years from the date of issuance in accordance with Directive 112-12.

Brian E. Kamoie
Assistant Administrator
Grant Programs Directorate