As a reminder, while this appendix contains Emergency Management Performance Grant (EMPG) Program-specific information and requirements, the main content of this Manual (non-appendix information) contains important information relevant to preparedness grant programs, including the EMPG Program.

FEMA will update and publish the full fiscal year (FY) 2022 version of the Preparedness Grants Manual at a future date, which will apply to the use of supplemental FY 2022 EMPG Program funds and will apply to the anticipated eventual full-year FY 2022 EMPG Program funds. Please be sure to read the main content of this Manual in addition to the program-specific appendices once the full version is published.

**EMPG Program Priorities**

The national priorities for the FY 2022 EMPG Program are:

- Equity
- Climate Resilience
- Readiness

These priorities correspond directly to goals outlined in the 2022-2026 FEMA Strategic Plan. All EMPG Program recipients are encouraged to review the strategic plan and consider how FY 2022 EMPG Program funding can be used to support the Plan’s goals and objectives as they apply to the state/territory’s specific needs and the needs of the whole community. The national priorities are
explained in further detail in the FY 2022 EMPG Program Notice of Funding Opportunity (NOFO).

Alignment of the EMPG Program to the National Preparedness System

The EMPG Program contributes to the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities. Core capabilities are essential for the execution of critical tasks for each of the five mission areas outlined in the National Preparedness Goal (the Goal). The EMPG Program’s allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas described in the Goal.

FEMA requires recipients to prioritize grant funding to demonstrate how EMPG Program-funded investments support closing capability gaps or sustaining capabilities identified in the Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) process and other relevant information sources, such as: 1) after-action reports (AARs) following exercises or real-world events; 2) audit and monitoring findings; 3) Hazard Mitigation Plans; and/or 4) other deliberate planning products. In advance of issuing the FY 2022 EMPG Program awards, FEMA Regional Administrators will identify individual regional priorities based on their unique knowledge of each region’s preparedness and emergency management needs and will share those priorities with the states and territories within their region. The final priorities will be identified and mutually agreed to by the state/territory and Regional Administrator through a collaborative negotiation process. Ideally, all EMPG Program-funded projects, as outlined in the approved FY 2022 EMPG Program Work Plan, will support the priorities identified through this collaborative approach. See EMPG Program Work Plan section for additional guidance.

FEMA continues to place emphasis on capabilities that address the greatest risks to the security and resilience of the United States. When applicable, funding should support deployable assets that can be used anywhere in the Nation through automatic assistance and mutual aid agreements, including, but not limited to, the Emergency Management Assistance Compact. The EMPG Program supports investments that improve the ability of jurisdictions nationwide to:
Prevent a threatened or an actual act of terrorism;
- Protect our citizens, residents, visitors, and assets against the greatest threats and hazards;
- Mitigate the loss of life and property by lessening the impact of future disasters;
- Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of a catastrophic incident; or
- Recover through a focus on the timely restoration, strengthening, and revitalization of infrastructure, housing, and a sustainable economy, as well as the health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident.

The core capabilities contained in the Goal are highly interdependent and require the use of existing preparedness networks and activities to improve training and exercise programs, innovation, and appropriate administrative, finance, and logistics systems.

**Implementation of the National Preparedness System**

**Identifying and Assessing Risk and Estimating Capability Requirements**

By December 31, 2022, recipients are required to complete a THIRA/SPR that addresses all 32 core capabilities and is compliant with Comprehensive Preparedness Guide (CPG) 201, Third Edition. Recipients are required to submit a THIRA every three (3) years to establish a consistent baseline for assessment. 2022 is the start of the new 3-year THIRA/SPR cycle and baseline assessment year. Specific guidance on the requirements for each core capability is provided through technical assistance and supplemental guidance, as some core capabilities have fewer reporting requirements than others. Recipients must continue to respond to a series of planning-related questions as part of the THIRA/SPR process.

While the THIRA is only required every three years, jurisdictions are required to submit an SPR annually. The submission deadline is December 31st each year (as applicable). For additional guidance on the THIRA/SPR, please refer to Comprehensive Preparedness Guide (CPG) 201, Third Edition. Recipients are also encouraged to refer to the Preparedness Toolkit, which is an online portal that provides the whole community with tools to aid in implementing all six areas.
of the National Preparedness System.

- In each EMPG Program recipient’s Biannual Strategy Implementation Report (BSIR), as part of programmatic monitoring, the recipient must describe how expenditures support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process. EMPG Program recipients will, on a project-by-project basis, check one of the following:
  - Building a capability with EMPG Program funding; or
  - Sustaining a capability with EMPG Program funding.

### Building and Sustaining Core Capabilities

Recipients must describe how proposed EMPG Program-funded projects will close capability gaps or sustain capabilities identified through the THIRA/SPR process, particularly SPR Step 2 (see Comprehensive Preparedness Guide (CPG) 201, Third Edition), or other relevant information sources that identify capability needs. See EMPG Program Work Plan section for additional guidance and requirements.

### National Incident Management System (NIMS) Implementation

EMPG Program recipients and subrecipients are required to implement NIMS. NIMS guides all levels of government, nongovernmental organizations (NGO), and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System. EMPG Program recipients must use standardized resource management concepts for resource typing, credentialing, and an inventory to facilitate the effective identification, dispatch, deployment, tracking, and recovery of resources.

EMPG Program funds may be used for NIMS implementation; specifically, to meet the requirements described in the NIMS Implementation Objectives for Local, State, Tribal, and Territorial Jurisdictions. This document should be used as a guide for both identifying NIMS implementation objectives and needs and as a tool
for evaluating NIMS compliance. Additional information about NIMS implementation is available at NIMS Implementation and Training.

- Recipients will answer questions in the applicable secondary NIMS assessment portion of the Unified Reporting Tool (URT) as part of a jurisdiction’s THIRA/SPR submission. This involves reporting on the status of the qualification system used within the jurisdiction and sub-jurisdictions, as outlined in the EMPG Program NOFO.

- Reporting will also be through a review by the FEMA Regional NIMS Coordinators during annual technical assistance visits with the states, tribes, and territories within their regions.

National Qualifications System (NQS) Implementation

EMPG Program recipients are encouraged to use EMPG Program funds to support NQS implementation efforts. For FY 2022, as a post-award requirement, all recipients in the 50 states and the District of Columbia must begin their NQS implementation efforts by achieving, or working towards achieving, the Phase 0 objectives outlined in the table below and must, at a minimum, develop an Implementation Plan, using the FEMA-provided two-page template. All other jurisdictions (including territories and FY 2022 EMPG Program subrecipients) are encouraged to begin working toward identifying frequently deployed positions and developing an NQS implementation plan, but implementation will not be required until FY23. For all states and territories, the following requirements shall apply:

- At a minimum, only ☑ will be required to meet NQS certification requirements.

- Recipients and subrecipients will be considered in compliance with the NQS requirements as long they are ☑ the NQS Implementation Objectives as outlined in the table below.
Additional NQS Implementation Guidance can be found at: National Qualification System Supplemental Documents.

| Phase 0: NQS Implementation Objectives for FY22 | Only the 50 States, the District of Columbia and Puerto Rico shall work toward implementation of NQS by developing an Implementation Plan, using the FEMA-provided two-page template. The Implementation Plan will identify a jurisdiction’s timeline for implementing NQS by FY25. All other jurisdictions are encouraged to begin working toward identifying, and implementation but will not be required until FY23. | Completion of a jurisdiction implementation plan. Identification of implementation challenges. |
All jurisdictions shall work toward implementation of NQS by developing an Implementation Plan, using the FEMA-provided two-page template.

Jurisdictions that began implementation in FY22 shall have designed and adopted organizational qualification system procedures, a certification program and credentialing standards for incident workforce personnel in alignment with the NIMS Guideline for the National Qualification System.

- Completion of a jurisdiction implementation plan.
- Identification of implementation challenges.
- Qualification policies and procedures approved by the jurisdiction. Procedures may include:
  - Establishment of a Qualification Review Board, or equivalent review processes for incident workforce personnel qualifications.
  - Individual and team coach and evaluation processes for incident workforce personnel qualifications.
All jurisdictions shall have designed and approved organizational qualification system procedures, certification program and credentialing standards for incident workforce personnel in alignment with the NIMS Guideline for the National Qualification System.

Jurisdictions that began implementation in FY22 shall have issued position task books (PTBs) to incident workforce personnel, as designated by the jurisdiction, and ensure incident workforce personnel show progress in working towards task endorsements and minimum training requirements.

In FY24, all jurisdictions partially satisfy the requirement by ensuring incident workforce personnel, which they designate, meet the minimum training requirements from the Job Title/Position Qualification.

Jurisdictions that began implementation in FY22 shall have issued PTBs to incident workforce personnel, which they designate, and ensure incident workforce personnel show progress in working towards task endorsements and minimum training requirements.

Jurisdictions shall use a resource management or qualification tool system to track the qualification, certification and credentialing of incident workforce personnel.

Qualification policies and procedures approved by the jurisdiction.

Minimum criteria that trainees must meet to be qualified in a specific position is outlined in the NQS Job Title/Position Qualification.

PTB issuance and completion data.

Adoption of a resource management system such as OneResponder, which is a web-based application hosted in a cloud environment. It allows AHJs to management qualifications of personnel.
All jurisdictions shall have issued PTBs to incident workforce personnel, which they designate, and ensure incident workforce personnel show progress in working towards task endorsements and minimum training requirements.

PTB issuance and completion data.

Data collection and reporting on NQS implementation will be addressed via the following:

- NIMS secondary assessment questions on the URT. This involves reporting on the status of the qualification system used within the jurisdiction and sub-jurisdictions.
- NIMS Regional Coordinator Program Guide that allows Regional NIMS Coordinators to review state NIMS programs.
- Review by the Regional NIMS Coordinators during annual technical assistance visits with the states, tribes, and territories within their regions.

**Logistics Planning**

**Distribution Management Plans**

EMPG Program recipients are required to develop and maintain a Distribution Management (DM) plan as an annex to their existing Emergency Operations Plan.
Comprehensive Preparedness Guide (CPG) 101 provides guidance on the fundamentals of planning and development of Emergency Operations Plans. The Distribution Management Plan Guide 2.0 (fema.gov) released in January 2022 provides information on how to develop the DM plan annex, key DM plan components, how to review and update a DM plan, and how FEMA reviews and evaluates the plans.

The DM plan must be reviewed by recipients on an annual basis and updated as necessary by September 30th of each calendar year. A question in the URT under the CPG 101 captures whether a jurisdiction has developed and incorporated a DM plan in its EOP.

- The DM plan should focus on the distribution of commodities and supplies such as food, water, generators and tarps to survivors following a disaster
- The DM plan should address strategies/plans for the following:
  - Requirements Defining
  - Resource Ordering
  - Distribution Methods
  - Inventory Management
  - Staging Areas
  - Transportation
  - Demobilization

FEMA Regional Logistics Branch staff will work with EMPG Program recipients to provide technical assistance during the development and maintenance of their DM plans, and to ensure all recipients have effective DM plans capable of integrating with federal, NGOs, private sector, and state, local, tribal, and territorial stakeholders during major disasters. Recipients should refer to the following for additional guidance:

- Information Bulletin (IB) 442, Guidance on Distribution Management Plans for the Fiscal Year 2019 Emergency Management Performance Grants Program; and
- Distribution Management Plan Guidance found at: Planning Guides | FEMA.gov

Additional Logistics Planning Resources
FEMA recommends that EMPG Program recipients use the following resources in developing their DM plan. To learn more about these programs and documents, or for any questions, please contact the Logistics Section Chief from your FEMA Region.

- The LCAT2 Flyer provides an overview of the LCAT2, how it is beneficial, how the LCAT process works, and how to obtain an LCAT2.

- FEMA Logistics developed a comprehensive POD training to assist states in developing actionable emergency distribution plans and understanding associated challenges. Additional information, including an explanatory DVD, POD guide, and online exam, are available on the Emergency Management Institute’s (EMI) website at FEMA - Emergency Management Institute (EMI) Course | IS-26: Guide to Points of Distribution.

- This basic IL training course familiarizes participants with the IL concepts of planning and response. The course also provides an overview of IL Partner disaster response organizations, discusses parameters for logistics support coordination, and creates a whole community forum to exchange the best logistics practices. Recipients may find more information on the course by visiting the EMI website Emergency Management Institute | EMI Courses & Schedules (fema.gov).

- Recipients will find additional planning guidance at: Planning Guides | FEMA.gov. Specific to logistics planning, Comprehensive Preparedness Guide (CPG) 101, Version 2.0 provides guidance on how to incorporate logistics into EOPs. Additionally, the Supply Chain Resilience Guide provides emergency managers with recommendations and best practices on how to analyze local supply chains and work with the private sector to enhance supply chain resilience using a five-phased approach.

**Funding for Critical Emergency Supplies**

Critical emergency supplies—such as shelf stable products, water, and basic medical supplies—are an allowable expense under the EMPG Program. Each state must have FEMA’s approval of a five-year viable inventory management plan prior to allocating grant funds for stockpiling purposes. The inventory
management five-year plan should include a distribution strategy and related sustainment costs if the grant expenditure is over $100,000.

Annual DM plan reviews will be reported in the Performance Progress Report (PPR) for the quarter ending September 30 of the most recently awarded EMPG Program. Reviews that result in an update must be submitted to the Regional Grants Division Director or Regional EMPG Program Manager for review by regional logistics staff. The Regional Logistics Staff will review and rate the plans using the latest FEMA Distribution Management Plan Guide 2.0.

Evacuation Planning

EMPG Program recipients should review and update their EOP in accordance with Comprehensive Preparedness Guide (CPG) 101 v3, Developing and Maintaining Emergency Operations Plans. Recipients are highly encouraged to include an evacuation plan or annex as part of their EOP as well as plans to exercise and validate the evacuation plan and capabilities. At a minimum, recipients should incorporate the National Response Framework’s Mass Evacuation Incident Annex’s planning considerations, and other FEMA documents related to evacuation planning, when developing their own Evacuation Plan or Annex. See National Response Framework (NRF), Third Edition (June 2016) and NRF Mass Evacuation Incident Annex (June 2008). Additional National Preparedness resources are available at: National Preparedness and Planning Guides. Specific to evacuation planning, the Evacuation and Shelter in Place Guidance identifies relevant concepts, considerations, and principles that can inform jurisdictions in planning for evacuation and/or shelter-in-place protective actions.

Disaster Housing Planning

Based on lessons learned from recent disasters, FEMA strongly encourages EMPG Program recipients to establish a State-Led Disaster Housing Task Force
(SLDHTF) plan as part of their EOP or as a standalone document and update their plan at least once every two years.

SLDHTFs lead and coordinate state, local, private sector, and community-based actions to assess housing impacts, identify appropriate post-disaster housing options, and establish processes for expediting post-disaster housing delivery. SLDHTF plans should clearly identify the roles, responsibilities, composition, and mobilization procedures for the SLDHTF, and how the SLDHTF integrates into the incident command structure. To have a successful SLDHTF plan, FEMA encourages recipients to:

- Complete the State Housing Strategy Template; and
- Establish a State Disaster Recovery Coordinator.

EMPG Program recipients are strongly encouraged to update their State Housing Strategy using the State Housing Strategy Template as part of their EOP or as a standalone document. In addition to the State Housing Strategy Template, recipients are encouraged to define and emphasize sheltering, short term, and permanent housing planning.

The State Housing Strategy Template helps states identify priorities and document critical, jurisdiction-specific processes and procedures to promote an efficient disaster housing mission. The template walks recipients through the following planning considerations as seen in the table below. See the State-Administered Direct Housing Grant Guide, July 2020 for the template and other supporting information.

State Housing Template Sections and Planning Considerations

<table>
<thead>
<tr>
<th>Section</th>
<th>Planning Considerations</th>
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<tbody>
<tr>
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<tr>
<td>SLDHTF Plan Organization</td>
<td>Participant inclusion, approaches for various types of housing disasters, available materials, available assistance programs, and sources for surge staffing</td>
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<td>-------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Housing Background</td>
<td>Identifying a jurisdiction’s current housing situation, priorities, capabilities, challenges, and known risks</td>
</tr>
<tr>
<td>Sheltering Phase Strategy</td>
<td>Identifying planning leads, current resources, timeline, key partners, cross-jurisdictional agreements, and other risks</td>
</tr>
<tr>
<td>Interim Housing Strategy</td>
<td>Identifying planning leads, current resources and capabilities, known areas of difficulty, key partners, relocation strategies, and risks</td>
</tr>
<tr>
<td>Permanent Housing Strategy</td>
<td>Identifying planning leads, long-term housing needs and prioritizations, current resources and capabilities, known areas of implementation challenges, relocation strategies, and risks</td>
</tr>
<tr>
<td>Pre-Disaster Activities</td>
<td>Creating communication plans, survivor transition plans, mitigation plans, and program closeout goals</td>
</tr>
</tbody>
</table>
FEMA encourages states to develop the capacity to administer FEMA Direct Housing Assistance through a reimbursable Inter-Governmental Service Agreement (IGSA). Under this arrangement, FEMA determines disaster survivors’ eligibility for specific direct housing options and makes all determinations regarding continuing eligibility, appeals, and eligibility terminations. FEMA also monitors the state’s administration of approved Direct Housing Options to ensure compliance with federal environmental, historic preservation, and floodplain management requirements as well as program conditions specified within the IGSA. States that choose to administer Direct Housing Assistance through an IGSA are required to develop a Direct Housing Administrative Plan and are encouraged to establish pre-placed contract to support the delivery of direct housing. Any contracts for this work would need to comply with the federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. For more information, regarding Direct Housing Assistance, please visit Chapter 5 of the Individuals and Households Program Unified Guidance and Chapter 3 of the Individual Assistance Program and Policy Guide (IAPPG).

Recipients are encouraged to exercise and validate their long-term sheltering and housing stabilization plans as part of an existing exercise program. This includes:

- Validating the organizational structure of the Housing Task Force and internal readiness capabilities to address post-disaster housing recovery issues or
administer FEMA Direct Housing Assistance under an IGSA
- Validating disaster housing communication plans and procedures that coordinate and integrate the activities and information generated by internal/external partners
- Validating data systems, security, and exchange protocols
- Validating planned actions and milestones transitioning from emergency sheltering to temporary housing to permanent housing and long-term recovery

Recipients are encouraged to review the planning guidance available at Planning Guides. The Planning Guides page includes: Planning Considerations: Disaster Housing Guidance for State, Local, Tribal and Territorial Partners (May 2020), which supplements Comprehensive Preparedness Guide (CPG) 101: Developing and Maintaining Emergency Operations Plans. It provides guidance on national housing priorities, types of housing, key considerations and housing-specific planning recommendations for state, local, tribal and territorial (SLTT) jurisdictions to use, in conjunction with the Six-Step Planning Process described in CPG 101, to develop or improve disaster housing plans.

**State Disaster Recovery Coordinator**

The Pre-Disaster Recovery Planning Guide helps states prepare for recovery by developing pre-disaster recovery plans that follow a process to engage members of the whole community, develop recovery capabilities, and create an organizational framework for recovery efforts.

FEMA strongly recommends that EMPG Program recipients include pre-disaster recovery planning as part of their State Readiness and Preparedness efforts by establishing a State Disaster Recovery Coordinator (SDRC). An effective pre-disaster recovery plan and process is crucial to help recipients prepare for major disaster incidents and recover effectively. Recipients are encouraged to use the Pre-Disaster Recovery Planning Guide to help inform their identification and establishment of a SDRC. The SDRC position should be included in the State Administrative Plan with the following responsibilities:
Development of the pre-disaster recovery plan, including state-level leadership and structure, formation of communication channels, multi-agency coordination, and building whole-community partnerships to support recovery efforts.

Set the stage for necessary strategic, operational, and tactical post-disaster planning, actions, and processes.

Maximize impact of federal, private sector, and nongovernmental dollars to enable recovery and resilience.

Accelerate the delivery of resources, including funding and technical assistance, to disaster-impacted communities.

Enable state leadership to better organize and identify gaps in the state’s recovery capabilities.

**Disaster Financial Management Policies and Procedures**

Lessons learned from recent hurricane seasons and wildfires demonstrate the need for impacted jurisdictions to improve their ability to immediately track and account for disaster costs. Disaster financial management includes policies and procedures that work to recover expenses pertaining to damage, emergency protective measures, and debris management during and after a disaster. These policies and procedures include, but are not limited to, those supporting eligible contract costs and force account labor, materials, and equipment.

FEMA strongly recommends that EMPG Program recipients include disaster financial management planning as part of their State Administrative Plan. An effective disaster financial management plan and process is crucial to help recipients prepare for declarations of emergencies or major disasters and plan for reimbursement. The table below details the processes that should be included in the State Administrative Plan and recommendations on where they should be placed.
| Section V Part D: Project Funding and Reimbursement | A process to ensure subrecipients are tracking and documenting disaster costs necessary for federal reimbursement, such as receipts, invoices, procurement documents, contracts, and insurance coverage/claims |
| Section V Part G: Records and Reports | A process to document disaster cost operations such as labor, equipment, and materials that are allowable under federal requirements |
| Section V Part D: Project Funding and Reimbursement | A process to ensure that subrecipients are not receiving a duplication in benefits |
| Section IV Part B: Organization and Staffing | A process to ensure pre-disaster contracts and procurement strategies are in place, if necessary |

Additionally, recipients are encouraged to use EMPG Program funds for training that develops, delivers, and exercises disaster financial management procedures.

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Recipients are encouraged to use the following resources to inform their disaster financial management planning efforts:

- Recipients are recommended to use the [State Administrative Plan template](https://fema.gov) found on FEMA’s Public Assistance webpage to inform their planning efforts. The template includes example
structure and content as a model for states to create own Administrative Plan.

- The **Public Assistance Program and Policy Guide (PAPPG)** combines all Public Assistance policy into a single volume and provides an overview of the PA program implementation process.

- Recipients are encouraged to view the Public Assistance Frequently Asked Questions and guidance found on the Public Assistance webpage to assist with disaster financial management planning efforts. The webpage provides information pertaining to documentation, Public Assistance grant funding eligibility, and hazard mitigation and can be found at Public Assistance Fact Sheets, Job Aids, and FAQs.

- Recipients are recommended to consult the DHS OIG report, *Audit Tips for Managing Disaster-Related Project Costs (OIG-17-120-D)* for further assistance in documenting and accounting for disaster-related costs. This report is informed by OIG audit findings and can assist recipients in addressing issues that are frequent findings in disaster-related audits.

- The **Disaster Financial Management Guide** provides guidance for state, local, tribal, and territorial partners on establishing and implementing sound disaster financial management practices.

- The **Procurement Disaster Assistance Team (PDAT)** provides training and other resources to assist grant recipients in their efforts to comply with federal procurement standards. See Contracting with Federal Funds for Goods and Services Before, During and After Disasters | FEMA.gov for additional information.

### Training and Exercises

Recipients are expected to engage senior leaders and other whole community stakeholders to identify preparedness priorities specific to training and exercise needs, which will guide development of a state/territory multi-year IPP. Similar to the EMPG Program Work Plan development process, these priorities should be
informed by various factors, including jurisdiction-specific threats and hazards (i.e., the THIRA); areas for improvement identified by real-world events and exercises (i.e., AARs); external requirements such as state or national preparedness reports (i.e., SPRs), homeland security policy, and industry reports; and accreditation standards, regulations, or legislative requirements. Recipients must document these priorities, in conjunction with the Work Plan development process, and use them to deploy a schedule of preparedness events and activities in the IPP. Information related to IPPs and Integrated Preparedness Planning Workshops (IPPWs) can be found on the HSEEP website at Homeland Security Exercise and Evaluation Program and FEMA Preparedness Toolkit.

Recipients should ensure that their EMPG Program Work Plans and IPPs align with and are complementary to one another and are used in tandem to support shared priorities for building and sustaining the state/territory’s preparedness capabilities. Recipients should use the same shared set of priorities in both their IPP and EMPG Program Work Plan, so that EMPG Program investments and projects help recipients implement the planning, training, and exercise activities in their IPPs and advance their IPP priorities. To this end, recipients should develop their IPPs and EMPG Program Work Plans together to create a planned, organized, and methodical approach for closing capability gaps over multiple years. This will help ensure that priorities for both the IPP and EMPG Program Work Plan are based on closing capability gaps documented in their THIRA/SPR and other relevant sources of information. For example, if a recipient selects Logistics and Distribution Management, Resilient Communications, and Housing as its priorities for its EMPG Program Work Plan, those should also be priorities in its IPP. Additionally, IPPs should include all planning, training, and exercise activities funded by the EMPG Program and included in EMPG Program Work Plans, as well as activities funded by other sources. This will ensure that recipients’ preparedness projects, investments, and activities are concentrated, focused, and oriented towards closing gaps related to their top priorities, regardless of funding source.

All recipients are required to develop and maintain a progressive exercise program consistent with HSEEP guidance in support of the National Exercise Program (NEP). The NEP serves as the principal exercise mechanism for
examining national preparedness and measuring readiness. The NEP is a two-year cycle of exercises across the nation that validates capabilities in all preparedness mission areas. The two-year NEP cycle is guided by Principals’ Strategic Priorities, established by the National Security Council and informed by preparedness data from jurisdictions across the Nation. See Exercises for additional information.

While there are no minimum exercise requirements, FEMA Regional Administrators and State Emergency Management Directors will negotiate an exercise program that addresses the priorities and capability gaps identified through the collaborative work plan development process. These exercises must be included in the FY 2022 EMPG Program Work Plan submitted for regional approval and should also be included in the state/territory’s IPP. See the EMPG Program Work Plan section for additional guidance.

The NEP provides exercise sponsors the opportunity to receive exercise design and delivery assistance, tools and resources, enhanced coordination, and the ability to directly influence and inform policy and preparedness programs. If you have any questions or would like to request assistance through the NEP, please visit the NEP website or reach out to the NEP directly at NEP@fema.dhs.gov.

- All EMPG Program-funded exercise activities must be captured in the approved EMPG Program Work Plan.
- EMPG Program-funded exercise costs in the Work Plan can include costs to plan, conduct and evaluate the exercise (e.g., planning, materials, props, contractual services for conducting the exercise, AAR and Improvement Plan [IP], etc.)
- All EMPG Program-funded exercise activities must be reported quarterly. To simplify reporting, it is recommended that recipients submit an updated Exercise Data Table from the FY 2022 EMPG Program Work Plan Template as an attachment to the quarterly PPR. For those recipients who choose not to use the FY 2022 EMPG Program Work Plan Template, the data and information found in the Exercise Data Table must still be submitted (in any chosen format) as an attachment to the PPR.
- EMPG Program-funded personnel costs associated with exercises are not required in the FY 2022 EMPG Program Work Plan Template for application or reporting purposes.
- Recipients must have a current multi-year IPP that identifies preparedness priorities and activities. The current multi-year IPP must be submitted to hseep@fema.dhs.gov and the Regional EMPG Program Manager before January 31st of each year.
- Recipients are encouraged to enter their exercise information into the Preparedness Toolkit at FEMA Preparedness Toolkit.

- Recipients must submit AAR/IPs to hseep@fema.dhs.gov and copy their Regional EMPG Program Manager and indicate which fiscal year’s funds were used (if applicable).
- Submission of AAR/IPs must take place within 90 days following completion of the single exercise or progressive series.
  - Recipients are encouraged to submit AAR/IPs reflecting tabletop exercises that validate critical plans or those reflecting large-scale functional or full-scale exercises that took place at the state, territorial, tribal, or regional level. Recipients are discouraged from submitting AAR/IPs specific to local jurisdictions that reflect drills.
  - If a state, territory, or local jurisdiction has experienced a major disaster and they would like to request exemptions for a scheduled exercise, the recipient should send this request to its assigned Regional EMPG Program Manager through the quarterly PPR. Exemptions will be reviewed by the Region on a case-by-case basis.
  - Recipients can access a sample AAR/IP template at Preparedness Toolkit Improvement Planning Templates.

Similar to the exercise guidance above, training activities should align to a current, multi-year IPP developed through an annual IPPW and build from training gaps identified in the THIRA/SPR and work plan development process. Further guidance concerning the IPP and the IPPW can be found at HSEEP Resources - Preparedness Toolkit.
Training should foster the development of a community-oriented approach to emergency management that emphasizes engagement at the community level, strengthens best practices, and provides a path toward building sustainable resilience, all of which is included in the curriculum of the EMI Basic Academy. The EMI Basic Academy provides a foundational education in emergency management as a way for emergency managers to begin or advance their career. The goal of the Basic Academy is to support the early careers of emergency managers through a training experience combining knowledge of all fundamental systems, concepts, and practices of cutting-edge emergency management.

EMPG Program funds used for training should support the nationwide implementation of NIMS. The NIMS Training Program establishes a national curriculum for NIMS and provides information on NIMS courses. Recipients are encouraged to place emphasis on the core competencies as defined in the NIMS Training Program. NIMS is also included in the curriculum of the EMI Basic Academy. The NIMS Training Program can be found at NIMS Implementation and Training.

All EMPG Program-funded personnel are expected to be trained emergency managers (see NQS Implementation section). All EMPG Program-funded personnel must complete either the Independent Study courses identified in the Professional Development Series or the National Emergency Management Basic Academy delivered either by EMI or at a sponsored state, local, tribal, territorial, regional, or other designated location. Further information on the National Emergency Management Basic Academy and the Emergency Management Professionals Program can be found at: EMI EMPP. A complete list of Independent Study Program Courses may be found at EMI Independent Study.

In addition to training activities aligned to and addressed in the IPP, all EMPG Program-funded personnel (including full- and part-time SLTT recipients and subrecipients) must complete the following training requirements and record proof of completion:

1. NIMS Training, Independent Study (IS)-100 (any version), IS-200 (any version), IS-700 (any version), and IS-800 (any version)1;  
2. Professional Development Series (PDS) the Emergency Management Professionals Program (EMPP) Basic Academy listed in the chart below.
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<th>IS-120.a: An Introduction to Exercises</th>
<th>IS-100 (any version): Introduction to the Incident Command System</th>
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<td>IS-244.b: Developing and Managing Volunteers</td>
<td>E/L103: Planning Emergency Operations</td>
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<tr>
<td>IS-244.b: Developing and Managing Volunteers</td>
<td>E/L104: Exercise Design</td>
</tr>
<tr>
<td>IS-244.b: Developing and Managing Volunteers</td>
<td>E/L105: Public Information &amp; Warning</td>
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The **EMI Basic Academy** provides this foundational Emergency Management education. To ensure the professional development of the emergency management workforce, the recipients must ensure a routine capabilities assessment is accomplished and an IPP is developed and implemented.

Per FEMA Grant Programs Directorate *Information Bulletin 432, Review and Approval Requirements for Training Courses Funded Through Preparedness Grants*, issued on July 19, 2018, states, territories, tribal entities, and high-risk urban areas are no longer required to request approval from FEMA for personnel to attend non-DHS FEMA training as long as the training is coordinated with and approved by the state, territory, tribal, or high-risk urban area Training Point of Contact (TPOC) and falls within the FEMA mission scope and the jurisdiction’s EOP.

FEMA will conduct periodic reviews of all state, territory, and urban area training funded by FEMA. These reviews may include requests for all course materials and physical observation of, or participation in, the funded training. If these reviews determine that courses are outside the scope of this guidance, recipients will be
asked to repay grant funds expended in support of those efforts.

For further information on developing courses using the instructional design methodology and tools that can facilitate the process, State Administrative Agencies (SAAs), and TPOCs are encouraged to review the National Training and Education Division (NTED) Training Resource and Development Center website at First Responder Training Resource and Development Center.

1NIMS training courses IS-100, IS-200, IS-700, and IS-800 only need to be taken once to fulfill requirements. Also, previous versions of the IS courses are still considered as meeting the NIMS training requirement.

This online searchable catalog features a compilation of courses managed by the three primary FEMA training organizations: the Center for Domestic Preparedness, EMI, and NTED. The catalog features a wide range of course topics in multiple delivery modes FEMA for federal, state, local, territorial, and tribal audiences. The catalog is located at First Responder Training and Education Division.

All EMPG Program-funded training activities must be captured in the approved EMPG Program Work Plan and should be included in the IPP. This includes training for which the only expenses are for overtime and/or backfill costs associated with emergency management personnel attending the training.

All EMPG Program-funded training activities must be reported quarterly. To simplify reporting, it is recommended the recipient submit an updated Training Data Table from the FY 2022 EMPG Program Work Plan Template as an attachment to the quarterly PPR. For those recipients who choose not to use the FY 2022 EMPG Program Work Plan Template, the data and information found in the Training Data Table must still be submitted (in any chosen format) as an attachment to the PPR.
Recipients must report their NIMS implementation status of their jurisdiction and sub-jurisdictions, including the training of personnel, in the applicable secondary NIMS assessment portion of the URT as part of their THIRA/SPR submission.

Recipients must maintain proof of completion of training requirements.

Training Information Reporting System (“Web Forms”): Web Forms is an electronic data management system built to assist SAA TPOCs and federal agencies to submit non-NTED training courses for inclusion in the State/Federal-Sponsored Course Catalog. The information collected is used in a two-step review process to ensure that the training programs adhere to the EMPG Program’s intent and the course content is sound and current. While reporting training activities through Web Forms is not required under the EMPG Program, the system remains available and can be accessed through the Web-Forms section of the FEMA National Preparedness Course Catalog to support recipients in their own tracking of training deliveries.

### Reviewing and Updating Planning Products

Based on the applicant’s current THIRA/SPR, capability levels, and resources, plans should be reviewed on an annual basis to determine if they remain relevant or need to be updated. This review should be based on a current THIRA/SPR and utilize information gathered during the capability validation process. These reviews will provide a means to determine priorities, direct preparedness actions, and calibrate goals and objectives.

### Additional Considerations

FEMA preparedness grant programs are intended to support the core capabilities across the five mission areas of Prevention, Protection, Mitigation, Response, and Recovery that are necessary to prepare for incidents that pose the greatest risk to the Nation’s security. Each program reflects the Department’s intent to build and sustain an integrated network of national capabilities across all levels of government and the whole community. Disparate governance structures must be
integrated and refined to ensure resources are targeted to support the most critical needs of a community based on risk-driven, capabilities-based planning. Strong and inclusive governance systems better ensure that disparate funding streams are coordinated and applied for maximum impact.

FEMA requires that all governance processes that guide the allocation of preparedness grant funds adhere to the following guiding principles:

- **Coordination of Investments**: Resources must be allocated to address the most critical capability needs as identified in the SPR and coordinated among affected preparedness stakeholders, including appropriate representatives of at-risk, underserved communities.

- **Stakeholder Visibility**: Stakeholders must be provided visibility on how preparedness grant funds are allocated and distributed, and for what purpose.

- **Substantive Local Involvement**: The tools and processes that are used to inform the critical priorities, which FEMA grants support, must include local government representatives. At the state and regional levels, local risk assessments must be included in the overarching analysis to ensure that all threats and hazards are accounted for. Primary focus should be on the needs of socially vulnerable, underserved populations and ensuring equity for those most at risk relative to disaster preparedness, response, and recovery.

- **Unique Preparedness Gaps**: FEMA recognizes that unique preparedness gaps exist at the local level. Grant recipients are responsible for ensuring the effective use of funds to address those gaps and for maintaining and sustaining existing capabilities, particularly when it comes to serving the needs of at-risk, underserved communities.

- **Inter/intra-state Partnerships**: Inter/intra-state partnerships and dependencies at the state and regional levels, including those within metropolitan areas, must be recognized.

**Program Performance Reporting Requirements**

**Performance Progress Reports (PPR)**
Recipients are responsible for providing performance reports to FEMA on a quarterly basis. As explained in the *Standardized Programmatic Reporting* section below, the quarterly PPRs must be based on the approved EMPG Program Work Plan and are due no later than 30 days after the end of the quarter. Although not mandatory, recipients are encouraged to use the updated FY 2022 EMPG Program Work Plan Template – specifically the Implementation Schedule, Training Data Table, and Exercise Data Table – to report on the status of planned project activities, any risks that may affect project progress or success, and updates to project schedules. The PPR (in the form of an updated Work Plan) shall be submitted in ND Grants. See [EMPG Program Work Plan](#) section for additional guidance.

The following reporting periods and due dates apply for the PPR:

<table>
<thead>
<tr>
<th>Reporting Period</th>
<th>Due Date</th>
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<tr>
<td>October 1 – December 31</td>
<td>January 30</td>
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<td>January 1 – March 31</td>
<td>April 30</td>
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<td>April 1 – June 30</td>
<td>July 30</td>
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<td>July 1 – September 30</td>
<td>October 30</td>
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**Standardized Programmatic Reporting for the EMPG Program**

The FY 2022 EMPG Program Work Plan Template has been modified to standardize data collection, which enables improved analysis and reporting. The EMPG Program Work Plan includes ten components:
Although use of the FY 2022 EMPG Program Work Plan Template is not mandatory (see EMPG Program Work Plan section), baseline data on personnel, training, and exercises, as well as the information included on the Grant Activities Outline and Implementation Schedule, must be provided in the EMPG Program Work Plan at the time of application regardless of the chosen work plan format.

The status of all EMPG Program-funded plans, training, and exercise activities must be reported quarterly as part of the PPR. To facilitate reporting, recipients are encouraged to submit an updated Implementation Schedule, Training Data Table, and Exercise Data Table from the FY 2022 EMPG Program Work Plan Template as an attachment to the quarterly PPR. Recipients who choose not to use the FY 2022 EMPG Program Work Plan Template must still provide the updated data and information included in the Implementation Schedule, Training Data Table, and Exercise Data Table, but may use a different format for reporting that information in their PPR submission.

**EMPG Program Funding Guidelines**

**Allowable Costs**

**Management and Administration (M&A)**

M&A activities are those defined as directly relating to the management and administration of EMPG Program funds, such as financial management, reporting, and program and financial monitoring. Some examples of M&A costs include grants management training for M&A staff, equipment and supplies for M&A staff
to administer the EMPG Program grant, travel costs for M&A staff to attend conferences or training related to the EMPG Program, travel costs for the M&A staff to conduct subrecipient monitoring, contractual services to support the M&A staff with M&A activities, and auditing costs related to the grant award to the extent required or permitted by statute or 2 C.F.R. Part 200. Characteristics of M&A expenses can include the following: 1) direct costs that are incurred to administer a particular Federal award; 2) identifiable and unique to each Federal award; 3) charged based on the activity performed for that particular Federal award; and 4) not duplicative of the same costs that are included in the approved Indirect Cost Rate Agreement, if applicable. It should be noted that salaries of state and local emergency managers are not typically categorized as M&A, unless the state or local Emergency Management Agency (EMA) chooses to assign personnel to specific M&A activities. In this case, personnel and fringe benefits for M&A is allowable.

If the SAA is not the EMA, the SAA is not eligible to retain funds for M&A. M&A costs are allowable for both state and local-level EMAs. The state EMA may use up to 5% of the EMPG Program award for M&A purposes. In addition, local EMAs may retain and use up to 5% of the amount received from the state for local M&A purposes.

Indirect Costs

Indirect costs are allowable under this program as described in 2 C.F.R. Part 200, including 2 C.F.R. § 200.414. Applicants with a current negotiated indirect cost rate agreement that desire to charge indirect costs to an award must provide a copy of their negotiated indirect cost rate agreement at the time of application. Not all applicants are required to have a current negotiated indirect cost rate agreement. Applicants that are not required by 2 C.F.R. Part 200 to have a negotiated indirect cost rate agreement but are required by 2 C.F.R. Part 200 to develop an indirect cost rate proposal must provide a copy of their proposal at the time of application. Per 2 C.F.R. Part 200, Appendix VII, paragraph D.1.b, state and local governments are not permitted to use the de minimus rate without seeking and receiving FEMA's approval of a case-by-case exception. State and local governments who do not have a current negotiated indirect cost rate agreement (including a provisional rate) and wish to request the case-by-case exception to use the de minimis rate should reach out to their FEMA Grants Management Specialist for further instructions. Applicants who wish to use a cost
allocation plan in lieu of an indirect cost rate must also reach out to the FEMA Grants Management Specialist for further instructions. Post-award requests to charge indirect costs will be considered on a case-by-case basis and based upon the submission of an agreement or proposal as discussed above or based upon the de minimus rate or cost allocation plan, as applicable.

**Unrecovered Indirect Costs**

In accordance with 2 C.F.R. § 200.306(c) “[u]nrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the non-Federal entity’s approved negotiated indirect cost rate.” Therefore, unrecovered indirect costs may be applied to meet cost share requirements of the EMPG Program grant with the approval of the Regional Grants Division. To meet the cost sharing requirements, the recipient’s indirect costs contributions must be verifiable, reasonable, allocable, necessary, and otherwise allowable under the grant program, and in compliance with all applicable Federal requirements and regulations.

**Whole Community Preparedness**

EMPG Program recipients should engage with the whole community to advance community and individual preparedness and to work as a nation to build and sustain resilience. Recipients should consider the three goals of the 2022-2026 FEMA Strategic Plan in their program design and delivery. Recipients should integrate program design and delivery practices that ensure representation and services for under-represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or other access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity, and other underserved populations.

Individual preparedness should be coordinated by an integrated body of government and nongovernmental representatives as well, including but not limited to, elected officials, the private sector (especially privately owned critical infrastructure), private nonprofits, nongovernmental organizations (including faith-based, community-based, and voluntary organizations), advocacy groups for
under-represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or other access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity, and other underserved populations. By engaging these stakeholders, EMPG Program recipients can help FEMA develop and promote a suite of well-targeted solutions for individuals and communities to adopt. Recipients should coordinate preparedness initiatives with FEMA and whole community partners to efficiently apply federal funding to reach the goal of individual and community resilience.

The following preparedness programs are allowable expenses and resources:

- Program, which educate volunteers about disaster preparedness for the hazards that may impact their area and train them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations. CERT offers a consistent, nationwide approach to volunteer training and organization that professional responders can rely on during disaster situations, allowing them to focus on more complex tasks.

- Programs that encourage and assist Americans in preparing for the true cost of disasters. Allowable activities include encouraging emergency savings, promoting home and renter’s insurance, and promoting flood insurance for individuals and families. Partnerships with local financial wellness organizations such as credit unions, financial counselors, community banks, and others that reach a variety of audiences are encouraged.

- Programs that serve as a critical safety net for Americans disproportionately impacted by disasters. Examples of community-based organizations include but are not limited to food banks, food pantries, homeless shelters, school readiness and after school centers, adult day care centers, job training centers, legal assistance centers, and cultural centers. Allowable activities include Whole Community exercises, trainings, and activities focused on staff preparedness, information sharing with clients and government, and continuity of essential functions in the event of an emergency.
Youth Preparedness Resources are available on Ready Kids. Bolstering youth preparedness across the nation is a priority for FEMA as the Agency works with state, local, tribal, and territorial partners to create a culture of preparedness in the United States. Information on youth-centric educational curricula, games, planning materials, and other relevant resources can be found at Ready Kids. Furthermore, FEMA’s Individual and Community Preparedness Division and regional-based Community Preparedness Officers are available to provide grant recipients with guidance and assistance. Please email FEMA-Prepare@fema.dhs.gov to contact one of the Agency’s subject matter experts.

The following are examples of youth preparedness activities that recipients are encouraged to undertake as allowable costs:

- Reach out to a local school board or elementary school to encourage the adoption of the Student Tools for Emergency Planning (STEP) curriculum. STEP is a classroom-based emergency preparedness curriculum for 4th- and 5th-graders in an easy, ready-to-teach format. Students will learn about disasters, emergencies, and hazards, and how to create a disaster supply kit and family emergency communication plan. An overview of the STEP program along with the instructor guide and student activity book is available at Ready STEP.

- Sponsor the creation of a Teen CERT in your jurisdiction. The CERT Program is a national program of volunteers trained in disaster preparedness and emergency response. Volunteers come from all ages and all walks of life, including teenagers. Additional information, including a step-by-step guide on how to start a Teen CERT, is available at Ready Teen CERT.

The following tools are available to order from FEMA’s warehouse free of charge:

“Prepare with Pedro” is a joint product of FEMA and the American Red Cross. The “Prepare with Pedro: Disaster Preparedness Activity Book” is designed to teach young children and their families about how to stay safe during disasters and emergencies. The book follows Pedro around the United States and offers safety advice through crosswords, coloring pages, matching games, and more. Additional information, including an ordering form, is available at Ready - Prepare with Pedro.
The Ready 2 Help card game is a fun way for kids to learn how to respond to emergencies by working with friends and using skills that will help in a real emergency. Ready 2 Help teaches five simple steps to stay safe and make a difference until help arrives:

- Stay Safe
- Stay Calm
- Get Help
- Give Info
- Give Care

Ready 2 Help is designed for children ages 8 and up. Additional information, including an ordering form, is available at Ready 2 Help.

Planning

Planning spans all five mission areas of the Goal and provides a methodical way to engage the whole community in the development of a strategic, operational, and/or community-based approach to preparedness. EMPG Program funds may be used to develop or enhance emergency management planning activities. Some examples include:

- Maintaining a current EOP that is aligned with guidelines set out in Comprehensive Preparedness Guide (CPG) 101: Developing and Maintaining Emergency Operations Plans
- Modifying existing incident management and emergency operations plans
- Developing/enhancing large-scale and catastrophic event incident plans

- Developing and updating Statewide Communication Interoperability Plans
- Developing and updating Tactical Interoperability Communications Plans
- Developing/enhancing financial and administrative procedures for use before, during, and after disaster events in support of a comprehensive emergency management program

- Developing or enhancing mutual aid agreements/compacts, including required membership in EMAC
- Developing/enhancing emergency operations plans to integrate citizen/volunteer and other Non-Governmental Organization (NGO) resources and participation
- Integrating program design and delivery practices that ensure representation and services for under-represented, diverse populations that may be more impacted by disasters, including children, seniors, individuals with disabilities or other access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity, and other underserved populations.

- Developing/enhancing logistics and resource management plans
- Developing/enhancing volunteer and/or donations management plans

- Developing/enhancing sheltering and evacuation plans, including plans for alerts/warning, crisis communications, pre-positioning of equipment for areas potentially impacted by mass evacuations, and re-entry

- Disaster housing planning, such as creating/supporting a state disaster housing task force and developing/enhancing state disaster housing plans
- Pre-event response, recovery, and mitigation plans in coordination with state, local, and tribal governments
Developing/enhancing other response and recovery plans

Developing recovery plans and preparedness programs consistent with the principles and guidance in the National Disaster Recovery Framework (NDRF) that will provide the foundation for recovery programs and whole community partnerships. Preparedness and pre-disaster planning were given special attention within the NDRF with specific guidance: *Planning for a Successful Disaster Recovery* (pages 63-70). For more information on the NDRF see [National Disaster Recovery Framework](https://www.fema.gov/national-disaster-recovery-framework).

**Continuity Planning**

Continuity planning and operations are an inherent element of each core capability. Continuity operations increase resilience and the probability that organizations can perform essential functions. FEMA develops and promulgates Federal Continuity Directives (FCDs) to establish continuity program and planning requirements for executive departments and agencies and Continuity Guidance Circulars (CGCs) for SLTT governments, non-governmental organizations, and private sector critical infrastructure owners and operators. This direction and guidance assist in developing capabilities for continuing the essential functions of federal, state, local, tribal, territorial governmental entities as well as the public/private critical infrastructure owners, operators, and regulators enabling them.

Presidential Policy 40, FCD 1, FCD 2, CGC 1, and CGC 2 outline the overarching continuity requirements and guidance for organizations and provide guidance, methodology, and checklists. For additional information on continuity programs, guidance, directives, and available technical assistance, visit [Continuity Resources and Technical Assistance](https://www.fema.gov/continuity-resources-and-technical-assistance) and [National Continuity Programs](https://www.fema.gov/national-continuity-programs).

Allowable continuity planning activities include the development of the following:

- Continuity of operations and Continuity of Government planning products for the continuance of essential functions and associated leadership;
- Risk-based needs assessments based on the THIRA to inform risk mitigation efforts to ensure the continuity of essential functions and associated leadership; and
Public and private sector outreach and messaging regarding continuity resilience benefits and strategies.

**Organization**

Per the *Robert T. Stafford Disaster Relief and Emergency Assistance Act*, Pub. L. No. 93-288, as amended, (42 U.S.C. §§ 5121-5207), EMPG Program funds may be used for all-hazards emergency management operations, staffing, and other day-to-day activities in support of emergency management, including hazard mitigation staffing of the State Hazard Mitigation Officer position; staffing CERT and Citizen Corps positions at the state and local levels to promote whole community engagement in all phases of emergency management; performing closeout activities on FEMA disaster assistance grants; staffing permanent technical advisors on children’s needs at the state, local, tribal, and territorial levels; and supporting fusion center analysts who are directly involved in all-hazards preparedness activities as defined by the Stafford Act. Proposed staffing activities should be linked to accomplishing the activities outlined in the EMPG Program Work Plan. Recipients are encouraged to fund at least one dedicated Planner, Training Officer, and Exercise Officer. Personnel costs, including salary, overtime, compensatory time off, and associated fringe benefits, are allowable EMPG Program costs and must comply with 2 C.F.R. Part 200, Subpart E – Cost Principles.

The following costs related to F/ERO credentialing and validation are allowable under the EMPG Program:

- Working group meetings and conferences relating to emergency responder credentialing and validation;
- Compiling data to enter into an emergency responder repository;
- Coordinating with other state, local, territorial, and tribal partners to ensure interoperability among existing and planned credentialing and validation systems and equipment; and
Planning to incorporate emergency responder identity and credential validation into training and exercises.

**Equipment**

Allowable equipment categories for the EMPG Program are listed in the [Authorized Equipment List (AEL)](#). Unless otherwise stated, equipment must meet all mandatory regulatory and/or FEMA-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. Allowable equipment includes equipment from the following AEL categories:

- Personal Protective Equipment (Category 1)
- Information Technology (Category 4)
- Cybersecurity Enhancement Equipment (Category 5)
- Interoperable Communications Equipment (Category 6)
- Detection Equipment (Category 7)
- Power Equipment (Category 10)
- Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE) Reference Materials (Category 11)
- CBRNE Incident Response Vehicles (Category 12)
- Physical Security Enhancement Equipment (Category 14)
- CBRNE Logistical Support Equipment (Category 19)
- Other Authorized Equipment (Category 21)

In addition to the above, general-purpose vehicles may be procured in order to carry out the responsibilities of the EMPG Program.

If recipients have questions concerning the eligibility of equipment not specifically addressed in the AEL, they should contact their Regional EMPG Program Manager for clarification. Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high-cost items and those subject to rapid technical advances. Large equipment purchases must be identified and explained. For more information regarding property management standards for equipment, please reference 2 C.F.R. Part 200, including 2 C.F.R. §§ 200.310, 200.313, and 200.316. Also see 2 C.F.R. §§ 200.216, 200.471, and
FEMA Policy #405-143-1, or successor policy, regarding prohibitions on covered telecommunications equipment or services.

Recipients using EMPG Program funds to support emergency communications equipment activities must comply with the SAFECOM Guidance on Emergency Communications Grants, including provisions on technical standards that ensure and enhance interoperable communications. This SAFECOM Guidance can be found at CISA Funding Resources.

In general, with exception of critical emergency supplies and the associated inventory management plan, equipment included in the AEL may be purchased without separate approval from FEMA. However, as with all grant-funded activities, the equipment purchase must be well justified and reasonable. Furthermore, the purchase must be supported by the approved Work Plan. If the equipment is not clearly supported by the approved Work Plan, the recipient must seek advance approval from the applicable FEMA Regional Grant Program Office prior to purchasing the equipment, and an updated Work Plan may be required.

FEMA will consider requests to purchase equipment that is not listed in the AEL on a case-by-case basis. Such requests should be submitted in writing to the applicable FEMA Regional Grant Program Office. FEMA’s review and approval of such requests will involve both the FEMA regional office and headquarters program staff to ensure nationwide consistency in the decision-making process and to support any necessary updates to the AEL.

All requests to purchase Small Unmanned Aircraft System (sUAS) must comply with IB 426 and must include the policies and procedures in place to safeguard individuals’ privacy, civil rights, and civil liberties in the jurisdiction that will purchase, take title to, or otherwise use the sUAS equipment. Additional information and requirements applicable to sUAS purchases can be found in the AEL at 03OE-07-SUAS.
In August 2020, FEMA alerted of an advisory guidance document issued by DHS, the Department of Justice, the Federal Aviation Administration, and the Federal Communications Commission: *Advisory on the Application of Federal Laws to the Acquisition and Use of Technology to Detect and Mitigate UAS*. The purpose of the advisory guidance document is to help non-federal public and private entities better understand the federal laws and regulations that may apply to the use of capabilities to detect and mitigate threats posed by UAS operations (i.e., Counter-UAS or C-UAS). The Departments and Agencies issuing the advisory guidance document, and FEMA, do not have the authority to approve non-federal public or private use of UAS detection or mitigation capabilities, nor do they conduct legal reviews of commercially available product compliance with those laws. The advisory does not address state and local laws nor potential civil liability, which UAS detection and mitigation capabilities may also implicate. It is strongly recommended that, prior to the testing, acquisition, installation, or use of UAS detection and/or mitigation systems, entities seek the advice of counsel experienced with both federal and state criminal, surveillance, and communications laws. Entities should conduct their own legal and technical analysis of each UAS detection and/or mitigation system and should not rely solely on vendors’ representations of the systems’ legality or functionality. Please also see the DHS press release on this topic for further information: [Interagency Issues Advisory on Use of Technology to Detect and Mitigate UAS](https://www.dhs.gov/press-release/interagency-issues-advisory-use-technology-detect-and-mitigate-uas).

### Critical Emergency Supplies

Critical emergency supplies—such as shelf stable products, water, and basic medical supplies—are an allowable expense under the EMPG Program. FEMA must approve a state’s five-year viable inventory management plan prior to allocating grant funds for stockpiling purposes. The five-year plan should include a distribution strategy and related sustainment costs if the grant expenditure is over $100,000.

### Training

EMPG Program funds may be used for a range of emergency management-related training activities to enhance the capabilities of state and local emergency management personnel through the establishment, support, conduct, and
attendance of training. Training activities should align to a current, multi-year IPP developed through an annual IPPW and build from training gaps identified in the THIRA/SPR process. Further guidance concerning the IPP and the IPPW can be found at [Preparedness Toolkit Program Management Templates](https://www.preparedness.gov/toolkit/templates). Training should:

- Foster the development of a community-oriented approach to emergency management that emphasizes engagement at the community level;
- Strengthen best practices; and
- Provide a path toward building sustainable resilience.

Allowable training-related costs include the following:

- Includes costs related to administering training, such as planning, scheduling, facilities, materials and supplies, reproduction of materials, and equipment. Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any training or training gaps, including those for children and individuals with disabilities or other access and functional needs, should be identified in the multi-year IPP and addressed in the training cycle. States are encouraged to use existing training rather than developing new courses. When developing new courses, states are encouraged to apply the Analyze, Design, Develop, Implement, and Evaluate (ADDIE) model for instruction design. More information is available at [First Responder Training and Education Division](https://www.fema.gov/first-responder-training-and-education-division).

- Overtime costs, including payments related to backfilling personnel, that 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 FEMA, 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, and hotel) are allowable as expenses by employees who are on travel status for official business related to approved training. International travel is not an allowable cost under this program unless approved in advance by FEMA.
Hiring of Full- or Part-Time Staff or Contractors/Consultants:

Full- or part-time staff or contractors/consultants may be hired to support direct training-related activities. Hiring of contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. Payment of salaries and fringe benefits must be in accordance with the policies of the state or unit(s) of local government and have the approval of the state or FEMA, whichever is applicable.

Costs associated with the certification and re-certification of instructors are allowed. States are encouraged to follow the FEMA 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.

Additional types of allowable training or training-related activities include, but are not limited to:

- Developing/enhancing systems to monitor training programs
- Conducting all-hazards emergency management training
- Attending EMI training or delivering EMI train-the-trainer courses
- Attending other FEMA-approved emergency management training
- State-approved, locally sponsored CERT training
- Mass evacuation training at local, state, territorial and tribal levels

Exercises

Allowable exercise-related costs include:

This includes costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel, and documentation. Recipients are encouraged to use free public space/locations/facilities whenever available prior to the rental of space/locations/facilities. Exercises should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Gaps identified during an exercise, including those for children and individuals with disabilities or other access and functional needs, should be included in the AAR/IP and addressed in the exercise cycle.
Hiring of Full- or Part-Time Staff or Contractors/Consultants:

Full- or part-time staff may be hired to support direct exercise activities. Payment of salaries and fringe benefits must be in accordance with the policies of the state or unit(s) of local government and have the approval of the state or FEMA, whichever is applicable. The services of contractors/consultants may also be procured to support the design, development, conduct, and evaluation of exercises. Hiring of contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327.

Overtime and Backfill:

The entire amount of overtime costs, including payments related to backfilling personnel, that 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 state or unit(s) of local government and has the approval of the state or FEMA, whichever is applicable. Dual compensation is never allowable, meaning, in other words, that 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 their work may benefit both entities.

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 the planning and conduct of the exercise activities.

Supplies are items that are expended or consumed while planning and conducting the exercise activities (e.g., gloves, non-sterile masks, and disposable protective equipment).

This refers to costs related to developing and maintaining an exercise program consistent with HSEEP.

These costs are limited to items consumed in direct support of exercise activities, such as space/locations rentals for planning and conducting an exercise, equipment rentals (e.g., portable toilets, tents), food/refreshments, and the procurement of other essential nondurable goods. Costs associated with inclusive practices and the provision of reasonable accommodations and modifications that facilitate full access for children and adults with disabilities are allowable.

Exercise-related costs include:
• Reimbursement for maintenance and/or wear and tear costs of general use vehicles (e.g., construction vehicles) and emergency response apparatus (e.g., fire trucks, ambulances). The only vehicle costs that are reimbursable are fuel/gasoline or mileage.
• Equipment that is purchased for permanent installation and/or use beyond the scope of exercise conduct (e.g., electronic messaging signs)
• Durable and nondurable goods purchased for installation and/or use beyond the scope of exercise conduct

**Construction and Renovation**

Construction and renovation projects for a state, local, tribal, or territorial government’s principal Emergency Operations Center (EOC), as defined by the SAA are allowable under the EMPG Program. FEMA must provide written approval prior to the use of any EMPG Program funds for construction or renovation. Requests for EMPG Program funds for construction of an EOC must be accompanied by an EOC Investment Justification (located in the Related Documents tab of the EMPG Program [Grants.gov](https://grants.gov) posting) to their Regional EMPG Program Manager for review. Additionally, recipients are required to submit a SF-424C Form, SF-424D Form, and Budget detail citing the project costs.

The above examples are not intended to exclude other construction projects as potentially allowable costs. For example, construction of a facility for the storage and distribution of critical emergency supplies and/or to serve as a staging area for deployment of emergency response resources is potentially an allowable expense. Other construction or renovation projects, such as a secondary or local EOC, will be considered on a case-by-case basis, as described below in the guidance regarding advance written approval.

Recipients must receive advance written approval from FEMA prior to the use of any annual EMPG Program funds for construction or renovation, including such activities at the subrecipient level. Such costs would need to fall within the scope of the recipient’s final approved Work Plan, otherwise an updated Work Plan may be required. Such requests should be submitted in writing to the applicable FEMA [Grants.gov](https://grants.gov).
Regional Grant Program Office. FEMA’s review and approval will involve both the regional office and the FEMA Grant Programs Directorate.

Real property improved under a federal award falls under the 2 C.F.R. Part 200 guidance for real property. In accordance with 2 C.F.R. § 200.311, a recipient or subrecipient may only use real property acquired or improved under a federal award for the originally authorized purpose, as long as it is needed for that purpose, during which time the recipient or subrecipient must not dispose of or encumber its title or other interests. However, upon the end of that period where it needs the property for the originally authorized purpose (i.e., the functional use of the property for which FEMA awarded the grant), the recipient or subrecipient will then dispose of the property in keeping with the requirements set forth in 2 C.F.R. § 200.311.

When a grant-funded property is no longer needed for the originally authorized purpose, the recipient or subrecipient (through the pass-through entity) must obtain disposition instructions from the cognizant FEMA Regional Administrator or the pass-through entity. For additional information on this, see Information Bulletin 458a, Clarifying Guidance for the Annual Emergency Management Performance Grant (EMPG) and the FY 2020 COVID-19 EMPG Supplemental (EMPG-S) Programs.

When applying for funds to construct communication towers, recipients and subrecipients must submit evidence that the Federal Communication Commission’s Section 106 review process has been completed and submit all documentation resulting from that review to FEMA prior to submitting materials for EHP review. Recipients and subrecipients are also encouraged to have completed as many steps as possible for a successful EHP review in support of their proposal for funding (e.g., coordination with their State Historic Preservation Office to identify potential historic preservation issues and to discuss the potential for project effects, compliance with all state and EHP laws and requirements). Projects for which the recipient believes an Environmental Assessment may be
needed, as defined in DHS Instruction Manual 023-01-001-01, Rev 01, FEMA Directive 108-1 and FEMA Instruction 108-1-1, must also be identified to the Regional EMPG Program Manager within six months of the award, and completed EHP review materials must be submitted no later than 12 months before the end of the period of performance. EHP review packets should be sent to gpdehpinfo@fema.gov.

EMPG Program recipients using funds for construction projects must comply with the *Davis-Bacon Act* and subsequent legislation (40 U.S.C. §§ 3141 et seq.). Grant recipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the state in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor wage determinations, is available at [Davis-Bacon and Related Acts](https://www.dol.gov/fair-labour-standards/)

EMPG Program recipients using funds to build or alter buildings must comply with accessibility requirements under the *Rehabilitation Act of 1973* and *Architectural Barriers Act of 1968* (ABA), as well as the *Americans with Disabilities Act* (ADA), if applicable, to ensure individuals with disabilities have access to such buildings. Accessibility standards under the ABA and ADA are highly similar. Additional information regarding compliance with the *Architectural Barriers Act* is available at [Guide to the ABA](https://www.ada.gov/ada.htm).

**Acquisition of Real Property**

Acquisition of real property is permissible if such property is needed to support other allowable program costs or activities. For additional information on this, see [Information Bulletin 458a, Clarifying Guidance for the Annual Emergency Management Performance Grant (EMPG) and the FY 2020 COVID-19 EMPG Supplemental (EMPG-S) Programs](https://www.fema.gov/news-releases/458a).
Consistent with the requirements outlined above regarding construction activities, recipients and subrecipients (through the pass-through entity) must obtain advance written approval from the cognizant FEMA Regional Administrator prior to obligating annual EMPG Program funds for acquisition of real property. Additionally, in cases of acquisition or improving real property, recipients are required to submit a SF-429-B, Real Property Status Report, Attachment B providing details of the relevant property to be acquired.

Property Use, Reporting, and Disposition Requirements

The acquisition, use, and disposition of real property shall be subject to the provisions of 2 C.F.R. Part 200. In accordance with 2 C.F.R. Part 200, recipients and subrecipients are required to report on the status of the acquired property on an annual basis using SF-429-A Real Property Status Report, Attachment A (General Reporting). Such reporting shall continue as long as the property is being used for the originally authorized purpose.

The same use and disposition guidance as outlined in Sections III.D.3 above applies to real property acquired with annual EMPG Program funds. For additional information on this, see Information Bulletin 458a, Clarifying Guidance for the Annual Emergency Management Performance Grant (EMPG) and the FY 2020 COVID-19 EMPG Supplemental (EMPG-S) Programs.

Leasing of Real Property

Leasing of real property is permissible if the property is needed to support other allowable annual EMPG Program activities.

Recipients and subrecipients (through the pass-through entity) must obtain advance written approval from the cognizant FEMA Regional Administrator prior to obligating annual EMPG Program funds for the leasing of real property.
In cases where a property will be leased and the lease will be paid in full or in part using annual EMPG Program, any costs associated with the lease that are charged to an annual EMPG Program award must occur within the period of performance of the associated award(s). Real property lease costs must also comply with 2 C.F.R. Part 200.

**Maintenance and Sustainment**

Use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable under all active grant awards, unless otherwise noted.

EMPG Program funds are intended to support the Goal and fund activities and projects that build and sustain the capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats and hazards that pose the greatest risk to the security of the Nation. To assist recipients in meeting this objective, the policy set forth in [IB 379: Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](https://www.fema.gov) allows for the expansion of eligible maintenance and sustainment costs, which must be:

1. In direct support of existing capabilities;
2. An otherwise allowable expenditure under the applicable grant program;
3. Tied to one of the core capabilities in the five mission areas contained within the Goal, and;
4. Shareable through the EMAC.

Additionally, eligible costs may also be in support of equipment, training, and critical resources that have previously been purchased with either federal grant funding or any other source of funding other than FEMA preparedness grant program dollars.

**Unallowable Costs**
Grant funds may not be used for the following:

- Unallowable Equipment: Grant funds must comply with IB 426 and may not be used for the purchase of firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed
- Expenditures for weapons systems and ammunition
- Costs associated with hiring, equipping, training, etc. sworn public safety officers whose job responsibilities include fulfilling traditional public safety duties such as law enforcement, firefighting, emergency medical services, or other first responder duties
- Costs that supplant traditional public safety positions and responsibilities
- Activities and projects unrelated to the completion and implementation of the EMPG Program

Recipients should consult with their Regional EMPG Program Manager prior to making any investment that does not clearly meet the allowable expense criteria established in this Manual and the EMPG Program NOFO.

**EMPG Program Work Plan**

Submission of an EMPG Program Work Plan is mandatory. It is a required component of the EMPG Program application. The Work Plan outlines the state’s emergency management sustainment and enhancement efforts, including new and ongoing activities and projects, that are driven by identified preparedness priorities and proposed for the EMPG Program period of performance. An FY 2022 EMPG Program Work Plan Template (available on the Grants.gov EMPG Program application page and on the FEMA.gov website at EMPG) is provided to facilitate the work plan development process. The submitted Work Plan must address all the data and information requirements included in the FY 2022 EMPG Program Work Plan Template and in the supplemental guidance included in this section. Therefore, EMPG Program applicants are strongly encouraged to use the provided FY 2022 EMPG Program Work Plan Template.

Prior to submission of the EMPG Program Work Plan, the applicant must work with the Regional Administrator or designated Regional EMPG Program Manager
to identify three to five priority areas which will serve as the focus for EMPG Program-funded investments. The priorities must be mutually agreed to by the applicant and Regional Administrator and should be driven by the THIRA/SPR process – specifically, the outputs from the THIRA/SPR process – and other relevant information sources such as AARs, audit and monitoring findings, Hazard Mitigation Plans and other deliberate planning products. Priorities should also reflect those included in each recipient's IPP so that recipients are focusing all investments, projects, and other resources on a common set of priorities. As they select priorities, applicants should consider which capability gaps would be most operationally consequential, must be closed most urgently, and could be meaningfully addressed within the period of performance. Applicants should refer to the EMPG Program NOFO for further guidance on the priority identification process.

Applicants must set at least one performance goal for each RA agreed-upon priority area that achieves a specific outcome. Each goal must be specific, measurable, and achievable within the period of performance, relevant to the priority area, and have a target date for completion. Applicants must describe how achieving each goal or objective will impact the priority area it supports by the end of the period of performance. Each goal must include an estimate quantifying the extent to which the supporting investments will close capability gaps (e.g., “Increase the percentage of people who can find and secure long-term housing by 10% within 1 year of an incident”). The FY 2022 EMPG Program Work Plan Template includes instructions and examples to help guide this process so that recipients can develop goals that focus on achieving specific outcomes.

The Regional Administrator or designated Regional EMPG Program Manager will ensure that the mutually agreed priorities are fully addressed in the EMPG Program Work Plan. In addition, the EMPG Program Regional Administrator must approve final Work Plans before states may draw down EMPG Program funds. Grant funds will be released upon approval of the state's final Work Plan.

Following Work Plan approval, regional EMPG Program Managers will work closely with recipients to monitor progress toward goals and activities in the Work Plans during the performance period and may request further documentation from the recipients to clarify the projected Work Plan. Further, in accordance with 2 C.F.R. §200.308 – Revision of budget and program plans, any changes to the...
approved Work Plan – including changes in project scope and budget changes within any direct cost category exceeding 10 percent of the total award amount – will require advance approval from the Regional Administrator or designated Regional EMPG Program Manager.

EMPG Program Work Plan Instructions

The FY 2022 EMPG Program Work Plan Template has been updated to support the collection of objective information and quantitative data that will allow FEMA to measure program effectiveness and investment impacts more effectively. This also enables compliance with 2 C.F.R. § 200.301, which requires federal awarding agencies to measure recipient performance to show achievement of program goals and objectives, share lessons learned, improve program outcomes, and foster adoption of promising practices. To this end, the FY 2022 EMPG Program guidance in the NOFO and Work Plan requires recipients to link EMPG Program-funded investments to THIRA/SPR results and other relevant materials that inform capability priorities and needs and to include specific performance measures that will allow FEMA to measure the impact of those investments based on the core capabilities that are addressed.

The FY 2022 EMPG Program Work Plan Template largely complements the THIRA/SPR process outlined in the Comprehensive Preparedness Guide (CPG) 201, Third Edition (CPG 201, v3). As noted in CPG 201, v3, a coordinated approach to track investments, and understand the return on investments, can help improve the effectiveness of those investments. Tracking how EMPG Program-funded investments result in specific, quantitative changes in capabilities can help guide communities’ strategic planning considerations and inform resource allocation decisions that will maximize effectiveness in building or sustaining capabilities. Therefore, applicants are encouraged to refer to CPG 201, v3, along with their most recent THIRA and SPR, when developing their EMPG Program Work Plan.

Table. As explained above, the focus of the FY 2022 EMPG Program Work Plan Template is on improving data collection to better enable measurement of grant outcomes. Therefore, the narrative content is minimized and many of the cells include dropdowns for selecting applicable data. This approach also helps to simplify the Work Plan development process.

Instructions for each Work Plan section are provided below. Additional guidance and instructions are provided in the FY 2022 EMPG Program Work Plan Template.

**Definitions and Guidance**

The Definitions and Guidance tab collects applicant information and provides instructions for completing each subsequent tab.

**Quick Links**

The Quick Links Tab uses the link functionality in Excel to allow users to navigate throughout the template quickly and minimize the need to scroll through projects and implementation schedules.

**Grant Investment Strategy**

The intent of the Grant Investment Strategy tab of the FY 2022 EMPG Program Work Plan Template is to provide an overview of the state/territory's preparedness investment strategy. It should serve as the foundation for completing the remainder of the Work Plan. It includes separate sections to explain the following:

- The performance goals associated with each priority area
- The most recent THIRA/SPR results
- Significant risks and capability gaps that currently exist
- Resulting preparedness priorities
- The anticipated impact of the proposed EMPG Program-funded investments

For the Performance Goals section, the applicant should identify the three to five priorities that were mutually agreed to and approved between the Regional
Administrator and the state/territory. These goals serve as the focus for the EMPG Program-funded investments. The reference materials used to identify the priorities should be cited and their relevance explained in this section.

At least one performance goal should be identified for each priority area. Each goal must be specific, measurable, achievable within the period of performance, relevant to the priority area, and have a target date for completion (i.e., SMART goal). It should describe how achieving each goal will impact the priority area it supports by the end of the period of performance.

**Grant Activities Outline**

The Grant Activities Outline is used to capture the proposed EMPG Program-funded projects and link them to the identified priorities, performance goals, and gaps or needs. Coupled with the Implementation Schedule, the Grant Activities Outline supports identification and tracking of EMPG Program-funded project outcomes, which will enable better understanding of the impacts of those investments relative to the performance goals and the associated core capabilities. Applicants can also designate whether a project addresses equity considerations and/or climate change impacts. Examples of allowable activities and associated core capabilities for projects that address the FY 2022 EMPG Program national priorities of equity, climate resilience, and readiness can be found in the [FY 2022 EMPG Program NOFO](https://www.fema.gov/grants/preparedness/emergency-management-performance/fy-22-appendix-h).

The Grant Activities Outline includes sections that allow the applicant to identify the performance goals that are supported by each project and the milestones that are critical to accomplishing each goal. Additional guidance on performance goals and milestones, including specific examples of each, are provided below.

The Grant Activities Outline also requires the applicant to explain the objective and anticipated impact of each project relative to the associated priorities, performance goals, and related core capabilities:

- The “Project Objective” should explain what the project will accomplish; specifically, how the project will address the identified gap or need and how it supports one or more of the identified performance goals.
The “Anticipated Project Impact” should explain the expected project outcome relative to the associated priorities and performance goals.

The impact statement should include a quantitative estimate of the degree to which the project will contribute to achieving the identified performance goal (see hierarchy example below).

Effective completion of the Grant Activities Outline requires an understanding of the established planning hierarchy. Priorities are at the top of the hierarchy, followed by performance goals that define a clear outcome or end-state and provide the basis for addressing each priority. Project proposals should be identified based on the performance goals. High priority capability gaps or needs identified through the THIRA/SPR process, particularly SPR Step 2, and other assessments are also used to inform project selection and to identify specific project objectives. Project objectives, and accompanying impact statements, should complement the performance goals by including similar outcome-focused metrics, as explained above. Lastly, identifying the specific project activities are the last step in the process of completing the GAO. Project activities are key components and/or milestones that are critical to successful completion of the project.

An example of this planning hierarchy for completing the GAO is provided below:

- Logistics and Supply Chain Management

  - Within 24 hours of an incident, identify and mobilize life-sustaining commodities, resources, and services to 10,000 people requiring shelter and 100,000 people requiring food and water. Maintain distribution system for at least 30 days.

  - Update State Logistics and Distribution Management Plan and qualify 40 additional personnel for logistics operations in NQS.

  - Increase capacity to identify and mobilize life-sustaining commodities, resources, and services to people requiring shelter, food, and water by 50%, allowing the state to do so for 7,500 people requiring shelter and 75,000 requiring food and water within 24 hours of an incident and maintain that distribution system for at least 30 days.
Convene cross-discipline working group meeting on May 30, 2022, to review current State Logistics and Distribution Management Plan.

All EMPG Program-funded investments must be accounted for in the Grant Activities Outline. However, recognizing that some sustainment activities, such as funding of emergency manager salaries, may not align to a specific priority or performance goal, applicants are not required to identify priorities and performance goals for such investments. However, all other portions of the Grant Activities Outline must be completed as a means to justify the applicable sustainment costs.

In cases where emergency management personnel are not assigned to support specific projects included in the Work Plan, the applicant may choose to create a single project (e.g., Emergency Management Personnel Project) to encompass the majority of the EMPG Program-funded salaries and fringe benefits costs. This single project would be populated on the Grant Activities Outline and include the associated activities, priorities, goals, anticipated outcomes, milestones, etc. for the applicable EMPG Program-funded emergency management staff, including staff supporting the M&A activities.

The various elements of the Grant Activities Outline tab are outlined below, along with basic instructions for completing the required entries. Supplemental guidance and instructions are included in the FY 2022 EMPG Program Work Plan Template.


- Provide further details on the project, particularly where the project name does not sufficiently describe the project.

- Briefly describe the specific gap or need addressed by the project.

- Select the documentation used to identify the cited gap or need from the drop-down menu.
• Explain how the project addresses the identified gap or need, and how it supports the identified priorities and performance goals.

• Explain the expected project outcome relative to the associated priorities and performance goals.

• Select whether the project will build or maintain/sustain the identified core capability(ies).

• Select whether the project will address equity considerations.

• Select whether the project will address the impacts of climate change.

• Select the applicable National Priority Area from the drop-down menu.

• Select from a drop-down list of the 32 core capabilities and other priorities identified in the latest version of the National Preparedness Report. If the priority is not included in the drop-down list, enter “other” for Primary, Secondary and/or Tertiary, and then enter the priority in the adjacent cell.

• Select whether the project relates to Planning, Organization, Equipment, Training, or Exercises. Multiple POETE categories can be selected to accommodate projects that span multiple categories. For example, building capability often involves a combination of planning, training, and exercise activities. Space is provided to populate the Primary, Secondary and Tertiary POETE category.

• This field is optional. It is made available to those states/territories that are EMAP certified and want to continue tracking their investments by EMAP Standard Elements. Select the appropriate EMAP Standard Elements from the drop-down menu, if applicable.

• Select the appropriate preparedness mission area supported by the project: Prevention, Protection, Mitigation, Response, or Recovery. Multiple mission areas can be selected to accommodate projects such as plans and exercises that involve multiple mission areas, and space is provided to populate the Primary, Secondary and Tertiary Mission Areas.
Select up to five core capabilities supported by the project. Indicate whether the Core Capability has a target with a gap rated as high priority.

Select the performance goal(s) from the drop-down menu. The drop-down menu will consist of the performance goals as entered in the Grant Investment Strategy.

Identify capability metrics prior to the project implementation.

Identify key project activities and other deliverables or outputs that are critical to accomplishing the identified performance goal and can be tracked to demonstrate progress toward achieving the performance goal.

**Detailed Budget – Excluding M&A**

The Detailed Budget – Excluding M&A tab enables a full accounting of all project activity costs, excluding M&A costs. This tab contains an itemization of non-M&A costs related to personnel, fringe benefits, travel, equipment, supplies, contractual services, construction, other, and indirect costs. For personnel and fringe benefits, the position title and percentage of time or fringe allocated to the EMPG Program grant is required. Each line item is assigned to its relevant project, allowing the information in mission areas, core capabilities, priorities, EMAP, and POETE categories to populate accordingly. This enables a breakdown of the full EMPG Program budget into various categories: Mission Area, Core Capabilities, National Priority Area, RA Agreed Upon Priority, EMAP Standard Elements, and POETE Category. The cells for each of these categories are automatically populated based on the project number as identified in the Grant Activities Outline.

**Budget Narrative – Excluding M&A**

The purpose of the Budget Narrative – Excluding M&A tab is to 1) justify the need for each line item and the cost estimates; 2) explain how costs relate to the programmatic goals of the project(s); and 3) supplement other budget information provided on the Detailed Budget – Excluding M&A tab. This tab will include a narrative for each cost category of the budget.
If funds or services are to be provided by a third party for in-kind match, a dated letter of commitment is required to document the donation. If the M&A Detailed Budget tab includes Indirect Costs, an approved Indirect Cost Rate Agreement signed by the recipient agency and the cognizant agency for the recipient, or a copy of the proposal to the cognizant federal or state agency for an indirect cost rate, must be included in the submission of the Work Plan for application purposes. Applicants who do not have a current negotiated indirect cost rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to the Grants Management Specialist for further instructions. Applicants who wish to use a cost allocation plan in lieu of an indirect cost rate must also reach out to the Grants Management Specialist for further instructions.

**Detailed Budget – M&A Only**

This Detailed Budget – M&A Only tab enables a full accounting of all project activity costs as they relate specifically to M&A costs. This tab contains an itemization of M&A costs related to personnel, fringe benefits, travel, equipment, supplies, contractual services, construction, and other direct costs. Each line item is assigned to its relevant project, allowing the information in mission areas, core capabilities, priorities, EMAP, and POETE categories to populate accordingly. This enables a breakdown of the full EMPG Program budget into various categories, including the following: Mission Area, Core Capabilities, National Priority Area, RA Agreed Upon Priority, EMAP Standard Elements, and POETE Category. The cells for each of these categories are automatically populated based on the project number as identified in the Grant Activities Outline.

**Budget Narrative – M&A Only**

The purpose of the Budget Narrative – M&A Only tab is to: 1) justify the need for each line item and the cost estimates; 2) explain how costs relate to the programmatic goals of the project(s); and 3) supplement other budget information...
provided on the Detailed Budget– M&A Only tab. For the Cost Share, applicants must include a detailed description of the source of the cost share/matching funds. If funds or services are to be provided by a third party for in-kind match, a dated letter of commitment is required to document the donation. This tab will include a narrative for each cost category of the budget.

**Information for the Detailed Budget and Budget Narrative**

This section of the Work Plan is a detailed description of the budget found in the SF-424A and must include a detailed discussion of how EMPG Program funds will be used. Applicants must include costs related to personnel, fringe benefits, travel, equipment, supplies, contractual costs, other direct costs, indirect costs, and total costs.

Applicants should use the following instructions and budget cost category descriptions to complete the Budget Detail section of the Work Plan.

- **Personnel**: List each position with a brief description of the duties and responsibilities (no personnel names), as well as the salary computation for staff. If a Cost-of-Living Adjustment increase and/or merit pay increase in salary will be provided for the position, include those costs in calculations for personnel and the associated fringe benefits on the applicable Detailed Budget and the Budget Narrative.

- **Fringe Benefits**: List the computation for fringe benefits for each of the personnel listed in the budget worksheet. Estimated rates for fringe are allowable but provide the basis for that estimation in the budget narrative (e.g., average percent fringe paid for most employees within the agency). If not using an estimate, list fringe benefit and the associated costs for each employee that will be paid by EMPG Program funding (e.g., Social Security/FICA, Unemployment Compensation, Medicare, Retirement, Health Insurance, Life Insurance, etc.). Also, in cases where fringe benefits costs are included in an indirect cost rate agreement, the fringe benefits cannot also be charged as a direct cost for reimbursement.

- **Travel**: Specify the mileage, per diem, estimated number of trips in-state and out-of-state, number of travelers, and other costs for each type of travel for staff.
Travel may be integral to the purpose of the proposed project (e.g., management, monitoring and/or oversight of grant award and/or subrecipients) or related to propose project activities (e.g., attendance at training or meetings related to management of the EMPG Program award). Travel costs identified in this section are for employees of the applicant/recipient only. For travel costs related to staff training, include as many details as possible about each proposed training cost, including the name of the training course(s), training provider, personnel who will attend the training, proposed dates (estimates are accepted), etc. Travel category costs do not include 1) costs for travel of consultants, contractors, consortia members, or other partner organizations, which are included in the “Contractual” category; or 2) travel costs for employees of subrecipient agencies (those should be included in the Contractual category, if applicable).

☑️ Equipment: List each equipment item for EMPG Program purposes only by Line Item Name and in the same order as listed on the Detailed Budget. Include a brief description of each equipment item (no brand names); per unit cost, quantity and total cost; location of equipment (if other than the direct recipient agency); and how the equipment will be utilized. Equipment is defined in 2 C.F.R. § 200.1.

☑️ Supplies: Include all tangible personal property other than those described in the definition of “equipment” as defined by 2 C.F.R. § 200.1. Supplies are also defined in 2 C.F.R. § 200.1. The budget detail should identify categories of supplies to be procured for EMPG Program purposes only (e.g., printing supplies, office supplies, etc.) and the calculation of those costs (e.g., based on monthly rates or based on an average of previous years’ similar costs). Non-tangible goods and services associated with supplies, such as printing service, photocopy services, and rental costs should be included in the “Other” category. Provide the basis for calculation of supplies including the Line Item Name and list supplies in the Budget Narrative in the same order as listed on the Detailed Budget. Subrecipient M&A and non-M&A costs should be included in the “Other” category.

☑️ Contractual: Identify each proposed contract related to EMPG Program purposes only and specify its purpose and estimated cost. Contractual/consultant services are those services to be carried out by an individual or organization (do not include company or individual names in budget narrative), other than the applicant, in the form of a procurement relationship. Leased or rented goods (equipment or supplies) for EMPG Program purposes should be included in the
“Other” category. The applicant should list the proposed contract activities along with a brief description of the scope of EMPG Program work or services to be provided and proposed duration. Include the basis for the calculation of contractual services costs (e.g., contractor training instructor speaking fee, contractor travel costs and contractor instructional materials).

**Other**: This category should include only those types of direct costs that do not fit in any of the other budget categories and are related to EMPG Program purposes only. Include a description of each cost by Line-Item Name and in the same order as listed on the applicable Detailed Budget. Include the basis for calculation of the costs. Examples of costs for EMPG Program purposes that may be in this category include the following: insurance, rental/lease of equipment or supplies, equipment service or maintenance contracts, printing or photocopying rental, etc. Subrecipient M&A and non-M&A costs from their subawards (e.g., subgrants) are a distinct type of cost under this category. The term “subaward” means an award of financial assistance (money or property) by any legal agreement made by the recipient to an eligible subrecipient. This term does not include procurement purchases, technical assistance in the form of services instead of money, or other assistance in the form of revenue sharing, loans, loan guarantees, interest subsidies, insurance, or direct appropriations. Subcontracts are not subawards and belong in the contractual category. Applicants must provide the aggregate amount they propose to issue as subaward work and a description of the types of M&A and non-M&A activities to be supported.

- Include construction costs, including renovation projects for a state or territorial government’s principal EOC. Include a description of the types of construction or renovation services proposed and the calculation of these costs (no company or individual names). Subrecipient construction costs should be included in the Other category. M&A funding cannot be used for construction or renovation costs.

- If indirect charges are budgeted, indicate the approved rate and base (the cost categories for which this indirect cost percentage rate will be applied.) Indirect costs are those incurred by the recipient for a common or joint purpose that benefit more than one cost objective or project, and are not readily assignable to specific cost objectives or projects as a direct cost. In order for indirect costs to be allowable, the applicant must have a federal or state
negotiated indirect cost rate (e.g., fixed, predetermined, final or provisional), or must have submitted a proposal to the cognizant federal or state agency. An approved Indirect Cost Rate Agreement signed by the recipient agency and the cognizant agency for the recipient, or a copy of the proposal to the cognizant federal or state agency for an indirect cost rate, must be included in the submission of the Work Plan Template for application purposes.

Examples of Indirect Cost Rate calculations are shown below:

1. Personnel (Indirect Rate x Personnel = Indirect Costs)
2. Personnel and Fringe (Indirect Rate x Personnel & Fringe = Indirect Costs)
3. Total Direct Costs (Indirect Rate x Total Direct Costs = Indirect Costs)

Applicants who wish to use a cost allocation plan in lieu of an indirect cost rate must also reach out to the FEMA Grants Management Specialist for further instructions. Per 2 C.F.R. Part 200, Appendix VII, paragraph D.1.b, state and local governments are not permitted to use the de minimus rate without seeking and receiving FEMA’s approval of a case-by-case exception. Applicants who wish to request the case-by-case exception should reach out to their FEMA Grants Management Specialist for further instructions.

Post-award requests to charge indirect costs will be considered on a case-by-case basis and based upon the submission of an agreement or proposal as discussed above or based upon the de minimis rate or cost allocation plan, as applicable.

**EMPG Program Summary**

This tab includes summary information for the award as entered in the budget tabs and the Grant Activity Outline. The overall budget summary will include the total award amount, federal amount, non-federal amount (cost share), and M&A amount, along with the calculated percentage of each. The additional budget summary tables will calculate the amount allocated for federal funds, non-federal funds (cost share) and total project costs for each cost category. There is also a budget summary table with similar information for each primary mission area and core capability.
The EMPG Program Summary tab also provides users with an overview of their progress in the FY 2022 EMPG Program Performance Metrics. The metrics are automatically populated from the calculations of information provided in the Grant Activities Outline. These metrics aim to provide the count, percentage, and associated dollar amount affiliated with the following performance metrics: 1) Capability-building Projects for Alignment to Capability Gaps in SPR; 2) Funding Spent on Capability-building Projects Aligned to Capability Gaps in SPR; 3) Building Capabilities for High Priority Targets; 4) Regional and National Priority Area Alignment; and 5) Plans-Training-Exercise Alignment. The EMPG Program Summary Tab further provides a count of all projects that address equity considerations and climate change impacts.

**Implementation Schedule**

The Implementation Schedule includes the basic elements of a project management plan. It is used to capture key project activities to include both EMPG Program-funded activities that are critical to accomplishing the project objectives as identified in the Grant Activities Outline, as well as tasks that are essential to effective project management. Thus, this product can be used as a basic project management tool to plan and track the progress of key project activities and associated tasks. Key project activities should generally correlate with the “Milestones” identified for each project included in the Grant Activities Outline.

The Implementation Schedule enables the applicant to identify key project activities by year/quarter, the associated tasks, timelines, status reports, and challenges or risks that may affect successful completion of the activity as planned. It also allows for the tracking of project progress by including estimated and actual completion dates for each activity and the ability to enter quarterly accomplishments relating to the activity. This functionality allows for quarterly reporting of project progress, in accordance with the programmatic requirements of the EMPG Program. Also, data from the Implementation Schedule should be completed and submitted to FEMA as a component of quarterly reporting on grant activities.

The Implementation Schedule further allows the applicant to explain how their project addresses equity considerations. Possible examples include: 1) conducting
vulnerability assessments to identify and fully understand the vulnerabilities and needs of underserved communities relating to emergency preparedness; and, 2) updating emergency operations plans to ensure the needs of underserved communities are adequately addressed.

The Implementation Schedule also provides the applicant with the ability to explain how their project addresses the impacts of climate change.

**Training Data Table**

To facilitate consistent data reporting and performance measures collection, the FY 2022 EMPG Program Work Plan Template includes a Training Data Table. This table should reflect training activities outlined in the multi-year IPP and completion of required EMPG Program training courses. The data requirements are defined in the section below. Applicants/ recipients are not required to report EMPG Program-funded personnel costs associated with training. Training related to the NQS is not reported on the Training Data Table. Also, data from the Training Data Table should be completed and submitted to FEMA as a component of quarterly reporting on grant activities. Upon entering the project name or number in the template, the cells located to the right of the main Training Data Table will auto-populate the associated priority, mission area, capabilities, and functional areas based on the project data included in the Grant Activities Outline.
- Column 1 – Project Number from the Grant Activities Outline
- Column 2 – Project Name from the Grant Activities Outline
- Column 3 – Name of training course
- Column 4 – Scheduled date of training course
- Column 5 – Date training was conducted or completed
- Column 6 – Is the training course required by the EMPG Program?
- Column 7 – Number of personnel trained
- Column 8 – NIMS Training Course Number (if applicable)
- Column 9 – Is the training identified in the multi-year IPP

**Exercise Data Table**

To facilitate consistent data reporting and performance measure collection, an Exercise Data Table should be completed for any exercises that meet EMPG Program requirements and/or exercises conducted in whole or part with EMPG Program funds. The Exercise Data should include EMPG Program-funded exercises and costs to run the exercise (e.g., planning, materials, props, contractual services for conducting the exercise, AAR and IP, etc.). Any exercise planned or conducted during the grant period of performance should be reported on the Exercise Data Table. Applicants/recipient are not required to report EMPG Program-funded personnel costs associated with exercises. Data from the Exercise Data Table should also be completed and submitted to FEMA as a component of quarterly reporting on grant activities. The data requirements are defined in the section below. Upon entering the project name or number in the template, the cells located to the right of the main Exercise Data Table will auto-populate the associated priority, mission area, capabilities, and functional areas based on the project data included in the Grant Activities Outline.
- Column 1 – Project Number from the Grant Activities Outline
- Column 2 – Project Name from the Grant Activities Outline
- Column 3 – Exercise Name
- Column 4 – Scheduled date of exercise
- Column 5 – Date exercise conducted/completed
- Column 6 – Type of exercise (select from drop-down menu)
- Column 7 – Is the exercise part of a progressive exercise series?
- Column 8 – Is exercise identified in the multi-year IPP?
- Column 9– When was the AAR submitted to FEMA?