The U.S. Department of Homeland Security (DHS) Notice of Funding Opportunity (NOFO) Fiscal Year 2018 Intercity Bus Security Grant Program (IBSGP)

NOTE: If you are going to apply for this funding opportunity and have <u>not</u> obtained a Data Universal Numbering System (DUNS) number and/or <u>are not</u> currently registered in the System for Award Management (SAM), please take immediate action to obtain a DUNS Number, if applicable, and then to register immediately in SAM. It may take 4 weeks or more after you submit your SAM registration before your registration is active in SAM, then an additional 24 hours for Grants.gov to recognize your information. Information on obtaining a DUNS number and registering in SAM is available from Grants.gov at: http://www.grants.gov/web/grants/register.html. Detailed information regarding DUNS and SAM is also provided in Section D of this NOFO, subsection, Content and Form of Application Submission.

A. Program Description

Issued By

U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Grant Programs Directorate (GPD)

Catalog of Federal Domestic Assistance (CFDA) Number 97.057

CFDA Title

Intercity Bus Security Grant Program (IBSGP)

Notice of Funding Opportunity Title

Intercity Bus Security Grant Program

NOFO Number

DHS-18-GPD-057-00-01

Authorizing Authority for Program

Section 1532 of the *Implementing Recommendations of the 9/11 Commission Act of 2007* (Pub. L. No. 110-53) (6 U.S.C. § 1182)

Appropriation Authority for Program

Department of Homeland Security Appropriations Act, 2018, (Pub. L. No. 115-141)

Program Type

New

Program Overview, Objectives and Priorities

Overview

The FY 2018 Intercity Bus Security Grant Program (IBSGP) is set against the backdrop of a year in which the United States faced numerous and unprecedented homeland security challenges. These included the three major hurricanes that devastated parts of Texas, Florida, and much of Puerto Rico and the U.S. Virgin Islands, as well as massive wildfires across the State of California. In addition to these natural disasters, the Nation also responded to multiple incidents as part of the evolving threat landscape, including witnessing the first known terrorist attack executed against mass transportation on our soil; cyberattacks against critical port infrastructure; and mass casualty events involving both vehicles and active shooters.

The National Preparedness Goal (the Goal) defines what it means to be prepared for such diverse and complicated events. The National Preparedness System is the instrument the Nation employs to build, sustain, and deliver the core capabilities needed to achieve the goal of a more secure and resilient Nation. The development and sustainment of these core capabilities is not exclusive to any single level of government or organization, but rather requires the combined effort of the whole community. To that end, the FY 2018 IBSGP represents one part of a comprehensive set of measures authorized by Congress and implemented by the Administration. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, the IBSGP supports the goal to Strengthen National Preparedness and Resilience.

The recently released 2018-2022 FEMA Strategic Plan creates a shared vision for the field of emergency management and sets an ambitious, yet achievable, path forward to unify and further professionalize emergency management across the country. The Intercity Bus Security Grant Program supports the goal of Readying the Nation for Catastrophic Disasters. We invite all of our stakeholders and partners to also adopt these priorities and join us in building a stronger Agency and a more prepared and resilient Nation.

Objectives

The Fiscal Year (FY) 2018 Intercity Bus Security Grant Program (IBSGP) is one of DHS/FEMA's FY 2018 grant programs that directly support transportation infrastructure security activities. IBSGP is one tool in the comprehensive set of measures authorized by Congress and implemented by the Administration to strengthen the Nation's critical infrastructure against risks associated with potential terrorist attacks. IBSGP provides funding for critical infrastructure hardening and other physical security enhancements to support transit operators serving the Nation's highest-risk metropolitan areas.

Performance metrics for this program are as follows:

Percent of recipients who have a security plan that has been updated within the last three years.

Priorities

The FY 2018 IBSGP supports investments that improve the ability of organizations 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; and/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 FY 2018 IBSGP plays an important role in the implementation of the National Preparedness System by supporting the development and sustainment of core capabilities. Core capabilities are the distinct critical activities essential for the execution of each of the five mission areas outlined in the Goal. Building and sustaining core capabilities requires the combined effort of the whole community, rather than the exclusive effort of any single organization or level of government. The FY 2018 IBSGP's allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas.

B. Federal Award Information

Award Amounts, Important Dates, and Extensions

Available Funding for the FY 2018 IBSGP: \$2,000,000

Period of Performance: Thirty-Six (36) months

Extensions to the period of performance are allowed. For more information on period of performance extensions, refer to Section H – Additional Information of this NOFO.

Projected Period of Performance Start Date: September 1, 2018

Projected Period of Performance End Date: August 31, 2021

Funding Instrument: Grant

C. Eligibility Information

Eligible Applicants

Private operators providing transportation by an over-the-road bus that have completed a vulnerability assessment and developed a security plan that the Secretary of Homeland Security has approved as described in Section 1531 of the *Implementing Recommendations of the 9/11*

Commission Act of 2007 (9/11 Act) (Pub. L. No. 110-53) (6 U.S.C. § 1181) are eligible to apply for funding under this program.

Eligibility for funding is limited to applicants that meet one or both of the following criteria:

- Operate fixed-route intercity bus transportation providing services to a defined Urban Area Security Initiative (UASI) jurisdiction.
- Operate a charter bus service using over-the-road buses and provide a minimum of 50 trips annually to one or more defined UASI jurisdictions.

The following definitions are applicable for the purpose of meeting FY 2018 program eligibility requirements:

- **Fixed-route intercity bus service** is defined as passenger transportation service provided to the general public for compensation over specified, predetermined, and published routes between cities or terminals using over-the-road-buses.
- Charter bus service is defined as a bus service that operates neither over fixed-routes nor on regular schedules. Note: A charter bus service is characterized by the rental of a bus and the services of a driver to a person or group where all passengers embark and disembark at the same point. A charter bus service must use over-the-road buses.
- An **over-the-road bus** is defined as a vehicle designated for long-distance transportation of passengers, characterized by integral construction with an elevated passenger deck located over a baggage compartment and at least 35 feet in length, with a capacity of more than 30 passengers. Only over-the-road buses are eligible for vehicle security enhancements through this program. Limousines, mini-coaches, school buses, or any other vehicle that does not fit the definition of an over-the-road bus are not eligible.
- **UASI jurisdiction** is a high-risk urban area designated to receive Urban Area Security Initiative funding under the FY 2018 Homeland Security Grant Program (HSGP), as identified by the FY 2018 HSGP Notice of Funding Opportunity. This list is also available in this NOFO at Appendix A FY 2018 IBSGP UASI-Eligible Urban Areas.
- A **trip** is defined as a single bus journey from an embarkation point to the furthest destination in that journey. For example, a trip from New York City to Denver to San Francisco would be considered a single trip. A trip is made to a defined UASI jurisdiction if at any point in the trip the bus stops in a UASI jurisdiction and embarks or disembarks passengers. For example, a trip from Newburgh, NY to Manhattan to Charleston, WV is a trip to a defined UASI jurisdiction if passengers embark or disembark in Manhattan.

<u>Note</u>: Intracity bus service is not eligible for funding under the FY 2018 IBSGP. Funding for intracity bus security is addressed through the FY 2018 Transit Security Grant Program.

Ineligible Service Categories, include:

- School buses
- Fixed service routes under contract to transit authorities within UASI jurisdictions
- Fixed service routes not stopping in qualifying UASI jurisdictions
- Intracity trolley and/or tour services
- Bus company owners that are not operators

Eligibility Criteria

In order to be eligible for the FY 2018 IBSGP, operators must have developed or updated their security plan, which must be based on a security assessment such as the Baseline Assessment for Security Enhancement (BASE) performed by Transportation Security Inspectors-Surface from the Transportation Security Administration (TSA), within the last three years prior to receiving an FY 2018 award. A copy of the security plan and security assessment must be available for DHS review upon request.

All operators must have completed a vulnerability assessment and developed a security plan as required by Section 1531 of the 9/11 Act (6 U.S.C. § 1181) as follows:

- 1) Assessments and security plans should include, as appropriate:
 - Identification and evaluation of critical assets and infrastructure, including buses, platforms, stations, terminals, and information systems
 - Identification of vulnerabilities to those assets and infrastructure
 - Identification of gaps in physical security; passenger and cargo security, the security of programmable electronic devices, computers, or other automated systems which are used in providing over-the-road bus transportation; alarms, cameras, and other communications systems and utilities needed for over-the-road bus security purposes, including dispatching systems; emergency response planning; and employee training
- 2) Security plans should include, as appropriate:
 - The identification of a security coordinator having authority to implement security actions, coordinate security improvements, and receive communications from appropriate Federal officials regarding over-the-road bus security
 - A list of needed capital and operational improvements
 - Procedures to be implemented or used by the operator in response to a terrorist attack, including evacuation and passenger communication plans that include individuals with disabilities
 - The identification of steps taken with state and local law enforcement agencies, emergency responders, and Federal officials to coordinate security measures and plans for response to a terrorist attack
 - A strategy and timeline for conducting training to prepare front-line employees for potential security threats and conditions
 - Enhanced security measures to be taken by the operator when the Secretary of DHS declares a period of heightened security risk
 - Plans for providing redundant and backup systems required to ensure the continued operation of critical elements of the operator's system in the event of a terrorist attack

For additional information on the above requirements, please contact <u>highwaysecurity@tsa.dhs.gov</u>.

Project requests will not be considered until bus operators develop and certify vulnerability assessments and security plans. See <u>Appendix D – FY 2018 IBSGP Investment Justification and Budget Template</u> for a template Vulnerability Assessment/Security Plan certification statement.

Other Eligibility Criteria

National Incident Management System (NIMS) Implementation

Prior to allocation of any Federal preparedness awards in FY 2018, recipients must ensure and maintain adoption and implementation of NIMS. FEMA describes the specific activities involved in NIMS implementation in the NIMS Implementation Objectives (https://www.fema.gov/implementation-guidance-and-reporting).

Incident management activities require carefully managed resources (personnel, teams, facilities, equipment and/or supplies). Utilization of the standardized resource management concepts such as typing, credentialing, and inventorying promote a strong national mutual aid capability needed to support the delivery of core capabilities. Recipients should manage resources purchased or supported with FEMA grant funding according to NIMS resource management guidance.

Additional information on resource management and NIMS resource typing definitions and job titles/position qualifications are available under http://www.fema.gov/resource-management-mutual-aid.

Cost Share or Match

The FY 2018 IBSGP has a cost share requirement. Eligible IBSGP applicants shall agree to make available non-Federal funds to carry out an IBSGP award in an amount equal to, and not less than, 50-percent of the total project cost.

All IBSGP award recipients must provide a non-Federal entity contribution supporting 50 percent of the total of all project costs. The non-Federal entity contribution should be specifically identified for each proposed project. The non-Federal contribution has the same eligibility requirements as the Federal share and must be justified as part of the project within the investment justification.

For example, if the Federal award requires a 50-percent cost share and the total project cost is \$100,000, then:

- Federal share is 50 percent of \$100,000 = \$50,000
- Recipient cost share is 50 percent of \$100,000 = \$50,000

D. Application and Submission Information

Key Dates and Times

Date Posted to Grants.gov: May 21, 2018

Application Submission Deadline: June 20, 2018, 5:00 PM ET

All applications **must** be received by the established deadline. The Non-Disaster (ND) Grants System has a date stamp that indicates when an application is submitted. Applicants will receive an electronic message confirming receipt of the full application. **DHS/FEMA**

will not review applications that are received after the deadline or consider them for funding. DHS/FEMA may, however, extend the application deadline on request for any applicant who can demonstrate that good cause exists to justify extending the deadline. Good cause for an extension may include technical problems outside of the applicant's control that prevent submission of the application by the deadline, or other exigent or emergency circumstances. Applicants experiencing technical issues must notify the respective FEMA HQ Program Analyst prior to the application deadline. Applicants should contact the Centralized Scheduling and Information Desk (CSID) for FEMA HQ Program Analyst contact information. CSID can be reached by phone at (800) 368-6498 or by e-mail at askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

Anticipated Funding Selection Date: August 27, 2018

Anticipated Award Date: No later than September 30, 2018

Address to Request Application Package

Application forms and instructions are available on <u>Grants.gov</u> (hardcopies of the NOFO and associated application materials are not available). To access the application package, select "Applicants" then "Apply for Grants" followed by "Get Application Package." Enter the Funding Opportunity Number located on the first page of this NOFO. Select "Apply" and then "Create Workspace." Follow the prompts to download the instructions and begin the application.

In addition, the following Telephone Device for the Deaf (TDD) and/or Federal Information Relay Service (FIRS) number available for this Notice is: (800) 462-7585

Initial applications will be processed through the <u>Grants.gov</u> portal. Final applications are completed and submitted through FEMA's Non-Disaster Grants (<u>ND Grants</u>) System.

Content and Form of Application Submission

Applying for an award under this program is a multi-step process. To ensure that an application is submitted on time, applicants are advised to start the required steps well in advance of their submission. Failure of an applicant to comply with any of the required steps before the deadline for submitting their application may disqualify their application from funding.

The steps involved in applying for an award under this program are:

- 1. Applying for, updating, or verifying their Data Universal Numbering System (DUNS) Number and Employer ID Number (EIN);
- 2. Updating or verifying their System for Award Management (SAM) Registration;
- 3. Establishing an Authorized Organizational Representative (AOR) in Grants.gov;
- 4. Submitting an initial application in **Grants.gov**; and
- 5. Submitting the final application in the ND Grants system.

Unique Entity Identifier and System for Award Management (SAM)

All applicants for this award must:

- 1. Be registered in SAM before submitting its application;
- 2. Provide a valid DUNS number in its application; and
- 3. Continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by DHS/FEMA.

DHS/FEMA may not make a federal award to an applicant until the applicant has complied with all applicable DUNS and SAM requirements and, if an applicant has not fully complied with the requirements by the time DHS/FEMA is ready to make a federal award, DHS/FEMA may determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

Electronic Delivery

DHS/FEMA is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS/FEMA requires applicants to submit their initial applications online through <u>Grants.gov</u> and to submit final applications through <u>ND Grants</u>.

How to Register to Apply through **Grants.gov**

1. Overview: Read the instructions below about registering to apply for DHS/FEMA funds. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process. Reviewing and assembling the required information before beginning the registration process will alleviate last-minute searches for required information.

The registration process can take up to four weeks to complete. Therefore, registration should be done in sufficient time to ensure it does not impact your ability to meet required application submission deadlines.

Organizations must have a DUNS Number, active SAM registration, and Grants.gov account to apply for grants.

If individual applicants are eligible to apply for this grant funding opportunity, refer to: https://www.grants.gov/web/grants/applicants/registration.html

Organization applicants can find complete instructions here: https://www.grants.gov/web/grants/applicants/organization-registration.html

2. *Obtain a DUNS Number*: All entities applying for funding, including renewal funding, must have a DUNS number from Dun & Bradstreet (D&B). Applicants must enter the DUNS number in the data entry field labeled "Organizational DUNS" on the SF-424 form.

For more detailed instructions for obtaining a DUNS number, refer to: https://www.grants.gov/web/grants/applicants/organization-registration/step-1-obtain-duns-number.html

3. Register with SAM: In addition to having a DUNS number, all organizations applying online through Grants.gov must register with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

For more detailed instructions for registering with SAM, refer to: https://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html

4. Create a Grants.gov Account: The next step in the registration process is to create an account with Grants.gov. Applicants must know their organization's DUNS number to complete this process.

For more information, follow the on-screen instructions or refer to: https://www.grants.gov/web/grants/applicants/registration.html

5. Add a Profile to a Grants.gov Account: A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one Grants.gov account to access all of your grant applications. To add an organizational profile to your Grants.gov account, enter the DUNS Number for the organization in the DUNS field while adding a profile.

For more detailed instructions about creating a profile on Grants.gov, refer to: https://www.grants.gov/web/grants/applicants/registration/add-profile.html

6. EBiz POC Authorized Profile Roles: After you register with Grants.gov and create an Organization Applicant Profile, the organization applicant's request for Grants.gov roles and access is sent to the EBiz POC. The EBiz POC will then log in to Grants.gov and authorize the appropriate roles, which may include the AOR role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.

For more detailed instructions about creating a profile on Grants.gov, refer to: https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html

- 7. *Track Role Status*: To track your role request, refer to: https://www.grants.gov/web/grants/applicants/registration/track-role-status.html
- 8. Electronic Signature: When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The EBiz POC must authorize individuals who are able to make legally binding commitments on behalf of the organization as an AOR; this step is often missed and it is crucial for valid and timely submissions.

How to Submit an Initial Application to DHS/FEMA via Grants.gov

Grants.gov applicants apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different webforms within an application. For each Notice of Funding Opportunity (NOFO), you can create individual instances of a Workspace. Applicants are encouraged to submit their initial application in Grants.gov at least seven days before the June 20, 2018, application deadline.

Below is an overview of applying on Grants.gov. For access to complete instructions on how to apply for opportunities using Workspace, refer to: https://www.grants.gov/web/grants/applicants/workspace-overview.html

- 1. Create a Workspace: Creating a workspace allows you to complete it online and route it through your organization for review before submitting.
- 2. *Complete a Workspace*: Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission.
- 3. Adobe Reader: If you decide not to apply by filling out webforms you can download individual PDF forms in Workspace so that they will appear similar to other Standard or DHS/FEMA forms. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader.
 - NOTE: Visit the Adobe Software Compatibility page on <u>Grants.gov</u> to download the appropriate version of the software at: <u>https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html</u>
- 4. *Mandatory Fields in Forms:* In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.
- 5. Complete SF-424 Fields First: The forms are designed to fill in common required fields across other forms, such as the applicant name, address, and DUNS number. To trigger this feature, an applicant must complete the SF-424 information first. Once it is completed, the information will transfer to the other forms.
- 6. Submit a Workspace: An application may be submitted through workspace by clicking the "Sign and Submit" button on the Manage Workspace page, under the Forms tab. Grants.gov recommends submitting your application package at least seven days prior to the close date to provide you with time to correct any potential technical issues that may disrupt the application submission.
- 7. *Track a Workspace*: After successfully submitting a workspace package, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the Confirmation page that is generated after submission. Using the

tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

For additional training resources, including video tutorials, refer to: https://www.grants.gov/web/grants/applicant-training.html

Applicant Support: Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to the specific grant opportunity, contact the number listed in the application package of the grant you are applying for.

If you are experiencing difficulties with your submission, it is best to call the <u>Grants.gov</u> Support Center and get a ticket number. The Support Center ticket number will assist the DHS/FEMA with tracking your issue and understanding background information on the issue.

Submitting the Final Application in Non-Disaster Grants System (ND Grants)

After submitting the initial application in <u>Grants.gov</u>, eligible applicants will be notified by DHS/FEMA and asked to proceed with submitting their complete application package in <u>ND Grants</u>. Applicants can register early with ND Grants and are encouraged to begin their ND Grants registration at the time of this announcement or at the latest, seven days before the application deadline. Early registration will allow applicants to have adequate time to start and complete their application.

In <u>ND Grants</u> applicants will be prompted to submit all of the information contained in the following forms. Applicants should review these forms before applying to ensure they have all the information required:

- Standard Form 424A, Budget Information (Non-construction)
- Standard Form 424B, Standard Assurances (Non-construction)
- Standard Form LLL, Disclosure of Lobbying Activities

In addition, applicants must submit copies of the following in ND Grants:

- Investment Justification (only one IJ may be submitted)
- Budget
- Vulnerability Assessment/Security Plan Certificate
- Standard Form 424C, Budget Information (Construction), if applying to use funds for construction or renovation
- Standard Form 424D, Standard Assurances (Construction) if applying for funds to use for construction; and
- Indirect Cost Agreement, if the budget includes an Indirect Cost Rate.

The forms can be found here: http://www.grants.gov.

Timely Receipt Requirements and Proof of Timely Submission

All applications must be received in <u>ND Grants</u> by **5:00 PM Eastern Time on June 20, 2018.** Proof of timely submission is automatically recorded by <u>ND Grants</u>. An electronic date/time

stamp is generated within the system when the application is successfully received by ND Grants. The applicant with the AOR role who submitted the application will receive an acknowledgement of receipt and a tracking number (GRANTXXXXXXXX) from Grants.gov with the successful transmission of their initial application. This applicant with the AOR role will also receive the official date/time stamp and Grants.gov Tracking number in an email serving as proof of their timely submission.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before <u>Grants.gov</u> and <u>ND Grants</u> receive your application. Again, <u>Grants.gov</u> will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role. The <u>Grants.gov</u> Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the systems time to process the application. Applicants needing assistance with the <u>ND Grants</u> system should contact <u>ndgrants@fema.gov</u> or (800) 865-4076.

Environmental Planning and Historic Preservation (EHP) Compliance

As a Federal agency, DHS/FEMA is required to consider the effects of its actions on the environment and/or historic properties to ensure that all activities and programs funded by the agency, including grant funded projects, comply with Federal EHP regulations, laws and Executive Orders as applicable. Recipients and subrecipients proposing projects that have the potential to impact the environment, including but not limited to construction of communication towers, modification or renovation of existing buildings, structures and facilities, or new construction including replacement of facilities, must participate in the DHS/FEMA EHP review process. The EHP review process involves the submission of a detailed project description along with supporting documentation so that DHS/FEMA may determine whether the proposed project has the potential to impact environmental resources and/or historic properties. In some cases, DHS/FEMA is also required to consult with other regulatory agencies and the public in order to complete the review process. The EHP review process must be completed before funds are released to carry out the proposed project; otherwise FEMA may not be able to fund the project due to non-compliance with EHP laws, executive orders, regulations, and policies.

Additionally, all recipients are required to comply with DHS/FEMA EHP Policy Guidance, FEMA Policy #108-023-1. The EHP screening form is located https://www.fema.gov/media-library/assets/documents/85376.

Emergency Communications and Resilience

All entities using IBSGP funding to support emergency communications investments are required to comply with the <u>SAFECOM Guidance on Emergency Communications Grants</u> (<u>SAFECOM Guidance</u>). The SAFECOM Guidance provides current information on emergency communications policies, eligible costs, best practices, and technical standards for State, local, tribal, and territorial grantees investing Federal funds in emergency communications projects. It is also designed to promote and align with the <u>National Emergency Communications Plan</u> (NECP). Conformance with the SAFECOM Guidance helps ensure that Federally-funded investments are compatible, interoperable, resilient, and support national goals and objectives for improving emergency communications.

Funding Guidelines and Restrictions

Federal funds made available through this award may only be used for the purpose set forth in this award and must be consistent with the statutory authority for the award. Award funds may not be used for matching funds for any other Federal award, lobbying, or intervention in Federal regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal Government or any other government entity. Additional guidance and restrictions may be found in Appendix C: FY2018 IBSGP Funding Guidelines.

Cost Principles

Costs charged to this award must be consistent with the Cost Principles for Federal Awards located at 2 C.F.R. Part 200, Subpart E.

Pre-award Costs

Pre-award costs are not allowable and will not be approved, with the exception of costs resulting from pre-award grant writing services provided by an independent contractor that shall not exceed \$1,500. See Authorized Use of Contractual Grant Writers and/or Grant Managers below for additional details and restrictions.

Direct Costs

Planning

Planning-related costs are allowed under this program only as described in this NOFO.

Organization

Organization-related costs are not allowed under this program.

Equipment

Equipment costs are allowed under this program only as described in this NOFO.

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. § 200.313, located at http://www.ecfr.gov/cgi-bin/text-

idx?SID=c836a011886f180dac489e15c059b1aa&node=sg2.1.200 1309.sg2&rgn=div7.

Training

Training related costs are allowed under this program only as described in this NOFO.

Exercises

Exercise related costs are allowed under this program only as described in this NOFO.

Travel

Domestic travel costs are allowed under this program only as described in this NOFO. International travel is not an allowable cost unless approved in advance by FEMA.

Construction and Renovation

Construction and renovation costs for modifying terminals, garages, and facilities to enhance their security are allowed under this program only as described in this NOFO.

Operational Overtime

Operational Overtime costs are allowed under this program only as described in this NOFO.

Maintenance and Sustainment

Maintenance and sustainment costs are not allowed under this program.

Critical Emergency Supplies

Critical Emergency Supply-related costs are not allowed under this program.

For additional details on allowable costs under the IBSGP, See <u>Appendix C - FY 2018</u> <u>IBSGP Funding Guidelines</u>.

Management and Administration (M&A) Costs

Management and administration costs are allowed. Recipients may use up to five percent (5%) of the amount of the award for M&A. M&A activities are those defined as directly relating to the management and administration of IBSGP funds, such as financial management and monitoring. Management and administrative expenses must be based on actual expenses or known contractual costs. Requests that are simple percentages of the award, without supporting justification, will not be allowed or considered for reimbursement.

M&A costs are not operational costs as they are the necessary costs incurred in direct support of the grant or as a consequence of the grant and should be allocated across the entire lifecycle of the grant. Examples include preparing and submitting required programmatic and financial reports, establishing and/or maintaining equipment inventory, documenting operational and equipment expenditures for financial accounting purposes; and responding to official informational requests from state and federal oversight authorities.

See Appendix C - FY 2018 IBSGP Funding Guidelines for information about direct costs.

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equipment expenditures for financial accounting purposes; and responding to official informational requests from state and federal oversight authorities.

Authorized Use of Contractual Grant Writers and/or Grant Managers

A grant applicant may procure the services of a contractor to provide support and assistance for pre-award grant development services (grant writing) or post-award grant management and administrative services (grant management). As with all Federal grant-funded procurements, grant writer or grant management services must be procured in accordance with the Federal procurement standards at 2 C.F.R. §§ 200.317 – 200.326. See Section H regarding Procurement Integrity, particularly the sections applicable to non-state entities that discusses organizational conflicts of interest under 2 C.F.R. § 200.319(a) and traditional conflicts of interest under 2 C.F.R. § 200.318(c)(1).

DHS/FEMA considers a contracted grant-writer to be an agent of the recipient for any subsequent contracts the recipient procures under the same Federal award in which the grant-writer provided grant writing services. Federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of such specifications. A State must follow the same policies and procedures it uses for procurements of its non-Federal funds, pursuant to 2 C.F.R. § 200.317.

Regardless of whether an applicant or recipient uses grant writing and/or grant management services, the recipient is solely responsible for the fiscal and programmatic integrity of the grant and its authorized activities and expenditures. They must ensure adequate internal controls, including separation of duties, to safeguard grant assets, processes, and documentation, in keeping with the terms and conditions of its award, including this NOFO, and 2 C.F.R. Part 200.

Grant Writing Services

For FY 2018, grant writer services as a pre-award cost will be allowed. Costs resulting from pre-award grant writing services provided by an independent contractor shall not exceed \$1,500. Grant writing contractors will be allowed to assist the applicant in preparing, writing, and finalizing grant application materials and assisting the applicant with handling online application and submission requirements in Grants.gov and ND Grants. Grant writers may assist in a variety of ways up to and including the actual submission of the application. Applicants are informed that ultimately, the application and all information contained therein is the sole responsibility of the eligible applicant. No employee, officer, or agent of the recipient may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. DHS/FEMA considers a contracted grant-writer to be an agent of the recipient for any subsequent contracts the recipient procures under the same Federal award in which the grant-writer provided grant writing services.

By submitting the application, applicants are certifying all of the information contained therein is true and an accurate reflection of the organization, and that regardless of the applicant's intent, the submission of information that is false or misleading may result in actions by FEMA. These actions include but are not limited to the submitted application not being considered for award, temporary withholding of funding under the existing award

pending investigation, or referral to the DHS Office of the Inspector General. Applicants should review all documents submitted on their behalf by outside contractors to ensure accuracy and completeness.

Grant Managers

Grant management contractors provide support in the day-to-day management of an active grant and their services may be incurred as Management and Administration costs (M&A) of the award. Additionally, recipients may retain grant management contractors at their own expense.

Pre-Award Cost of up to \$1,500 Eligible for Reimbursement

To assist applicants with the cost of grant writing services, FEMA is permitting a one-time pre-award cost of no more than \$1,500 per applicant per year for contractual grant writing services as part of the recipient's M&A costs. This is only intended to cover costs associated with a grant writer and may not be used to reimburse the applicant for their own time and effort in the development of a grant application. Additionally, the applicant may be required to pay this fee with their own funds during the application preparation and submission period; if the applicant subsequently receives an award, they may then request to be reimbursed once grant funds become available for that cost, not to exceed \$1,500. If the applicant does not receive an award, this cost will not be reimbursed by the federal government. The applicant must understand this risk and be able to cover this cost if an award is not made.

If an applicant intends to request reimbursement for this one-time pre-award cost, it must include this request in its application materials, including in the Budget Detail Worksheet for the Investment Justification. Failure to clearly identify this as a separate cost in the application may result in its disallowance. This is the only pre-award cost eligible for reimbursement. Recipients must maintain grant writer fee documentation including, but not limited to: a copy of the solicitation, such as a quote request, rate request, invitation to bid, or request for proposals; a copy of the grant writer's contract agreement; a copy of the invoice or purchase order; and a copy of the canceled check or proof of payment. These records must be made available to DHS/FEMA upon request.

Indirect (Facilities and Administrative [F&A]) Costs

Indirect costs are allowable under this program as described in 2 C.F.R. § 200.414. With the exception of recipients who have never received a negotiated indirect cost rate as described in 2 C.F.R. § 200.414(f), recipients must have an approved indirect cost rate agreement with their cognizant Federal agency to charge indirect costs to this award. A copy of the approved rate (a fully executed agreement, negotiated with the applicant's cognizant Federal agency) is required at the time of application, and must be provided to DHS/FEMA before indirect costs are charged to the award.

IBSGP Specific Application Instructions

All applicants will submit their IBSGP grant application, and the associated Investment Justification (IJ) to include a detailed budget, as file attachments within ND Grants prior to the application deadline.

Investment Justification

As part of the FY 2018 IBSGP application process, applicants must develop and submit a comprehensive and formal IJ that addresses the initiative being proposed for funding, including estimated M&A costs. Applicants may only submit one (1) Investment Justification. The IJ must demonstrate how proposed projects address gaps and deficiencies in current programs and capabilities. It must also demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA.

IBSGP projects must be: 1) both feasible and effective at reducing the risks for which the project was designed; and 2) able to be fully completed within the 3-year period of performance. For information on the feasibility and effectiveness determination see the <u>Application and Review Information</u> section. The applicant must fully explain how the requested project satisfies a need or reduces a risk as outlined in their most recent vulnerability assessment *and* satisfies an aspect of their capital or operational security needs detailed in the applicant's security plan.

<u>Applicants must include their U.S. Department of Transportation (USDOT) number in Section 1.A. of the Investment Justification</u>. Additionally, applicants must ensure that the IJ is consistent with all applicable requirements outlined in this NOFO.

Detailed Budget

Applicants also must provide a detailed budget for the funds requested. The budget must be complete, reasonable, and cost-effective in relation to the proposed project. The budget should provide the basis of computation of all project-related costs, any appropriate narrative, and a detail of all M&A costs. Applicants should round costs to the nearest whole dollar.

The detailed budget must be submitted with the grant application as a file attachment within <u>ND Grants</u> system. Applicants must use the following file naming convention when submitting required documents as part of the FY 2018 IBSGP:

Legal Name of Bus Company_IJ Number_Budget (Example: ABC Bus Lines_IJ#1_Budget)

When completing the budget, applicants should break costs down to the smallest unit possible. For instance, a fencing project should provide the cost per linear foot of fencing and a closed circuit television (CCTV) project should provide the cost per camera. This will greatly assist the review panel in determining the type and cost effectiveness of the different components of the project.

Additionally, any technical or computer equipment should be described in adequate detail to improve understanding of the function of such devices. The budget narrative section of the application allows applicants the opportunity to describe the purpose and function of project components. Budget narratives should also clearly identify any optional features or capabilities, such as a Global Positioning System (GPS) unit equipped with a panic button. Optional or potential capabilities not clearly identified will be assumed as not being present.

Applicants will find a sample budget detail worksheet in <u>Appendix D - FY 2018 IBSGP</u> <u>Investment Justification and Budget Template</u>. This worksheet may be used as a guide to assist applicants in the preparation of the budget and budget narrative.

All IBSGP award recipients must provide a non-Federal entity contribution supporting 50 percent of the total of all project costs. The non-Federal entity contribution should be specifically identified for each proposed project. The non-Federal contribution has the same eligibility requirements as the Federal share and must be justified as part of the project within the budget and investment justification.

Vulnerability Assessment and Security Plan Certification Statement

Applicants must have a current vulnerability assessment and security plan (updated within the last three years) to apply for projects and must complete, sign and date the Vulnerability Assessment and Security Plan Certification Statement provided in Appendix D - FY 2018 IBSGP Investment Justification and Budget Template.

When applying for projects, applicants must justify those projects based on the findings and recommendations in their vulnerability assessment and security plan. Applicants who do not tie their proposed projects to their company specific security plans risk receiving lower scores than applicants who do so.

E. Application Review Information

Application Evaluation Criteria

Prior to making an award, FEMA is required by 31 U.S.C. § 3321 and 41 U.S.C. § 2313 to review information available through any OMB-designated repositories of government wide eligibility qualification or financial integrity information. Application evaluation criteria may include the following risk based considerations related to the applicant: (1) financial stability; (2) quality of management systems and ability to meet management standards; (3) history of performance in managing Federal award; (4) reports and findings from audits; and (5) ability to effectively implement statutory, regulatory, or other requirements.

FY 2018 IBSGP applications will be evaluated through a review process for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed investments.

Grant projects must be: 1) both feasible and effective at reducing the risks for which the project was designed; and 2) able to be fully completed within the 3-year period of performance. FEMA will use the information provided in the application, as well as any supporting documentation, to determine the feasibility and effectiveness of the grant project. Information that would assist in the feasibility and effectiveness determination includes the following:

- Scope of work (purpose and objectives of the project, identification of what is being protected)
- Desired outcomes, including expected long-term impact where applicable
- Summary of status of planning and design accomplished to date (e.g. included in a capital improvement plan)

• Project schedule

Grant recipients are expected to conform, as applicable, with accepted engineering practices, established codes, standards, modeling techniques, and best practices.

Applications will be reviewed by a National Review Panel (NRP). The NRP will consist of Federal officials from the Federal Motor Carrier Safety Administration (FMCSA), Transportation Security Administration, and the Federal Emergency Management Agency. The NRP will rate applications based on the following criteria. Applicants can score a maximum of 100 points.

Funding Guidelines. Projects will be evaluated and scored based on the extent to which they address the Funding Guidelines described in this FY 2018 NOFO (see Appendix C – FY 2018 IBSGP Funding Guidelines). The IJ should provide details on specific needs to be addressed, vision, goals, and objectives. It should also provide evidence of how the project fits into an overall effort to meet critical infrastructure security requirements, and how the investment provides a significant security impact.

Possible Review Panel Funding Guidelines Score: 0-20 points

Cost effectiveness. Projects will be evaluated and prioritized based on the expected impact on security relative to the investment. The IJ should provide quantitative evidence of the security impact, as well as justification for the strategic use of the proposed budget. The project cost levels should be commensurate with the security impact, and the proposed solution should be reasonable and advantageous over other possible solutions.

Possible Review Panel Cost Effectiveness Score: 0-15 points

Ability to reduce risk of catastrophic events. Projects will be evaluated and prioritized based on their ability to reduce risk. The IJ should demonstrate an ability to reduce risk, providing quantitative evidence of the project's security impact, potential consequences of not funding the project, and a strategy to address specific risk areas. The IJ should also reflect robust regional coordination and an investment strategy that institutionalizes regional security strategy integration in the Nation's highest risk metropolitan areas.

Possible Review Panel Risk Reduction Score: 0-35 points

Sustainability without additional Federal funds and leveraging of other funding. Projects will be evaluated and prioritized regarding the extent to which they exhibit a likelihood of success, or continued success, without requiring additional Federal assistance.

Possible Review Panel Sustainability Score: 0-10 points

Timeline. Projects will be evaluated and prioritized on the ability of the applicant to complete the proposed project within submitted timelines. The IJ should provide a timeline and demonstrate evidence of ability to complete the project within submitted timeline based

on proposed strategy, identified implementation challenges, management and resource plan, and reasonableness of anticipated schedule.

Possible Review Panel Timelines Score: 0-10 points

Risk to critical infrastructure. The FY 2018 IBSGP will use risk-based prioritization consistent with DHS policy. This score is calculated using a risk process developed and maintained by TSA and provided separately in accordance with proper Sensitive Security Information (SSI) handling protocol. Scores from TSA are informed by their risk methodology ranking, the relative risk of high-risk UASI jurisdictions, and giving higher priority to those with routes passing through underwater tunnels.

Possible Review Panel Critical Infrastructure Score: 0-10 points

Supplemental Financial Integrity Review

If the anticipated Federal award amount will be greater than the simplified acquisition threshold, currently \$150,000:

- Prior to making a Federal award with a total amount of Federal share greater than the simplified acquisition threshold, DHS/FEMA is required to review and consider any information about the applicant in the Federal Awardee Performance and Integrity Information System (FAPIIS) found at http://fapiis.gov/fapiis/index.action, which is also accessible through the SAM website at https://www.sam.gov/portal/SAM/#1.
- An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a Federal awarding agency previously entered.
- DHS/FEMA will consider any comments by the applicant, in addition to the FAPIIS information, in making a judgment about the applicant's integrity, business ethics, and record of performance under Federal awards when completing the review of risk posed by applicants, as described in 2 CFR §200.205.

Review and Selection Process

Recipients must comply with all administrative requirements described herein — including the submission of the IJ, budget, and other application materials as required. Having met all administrative requirements, the application will be scored based on a methodology that will ensure consistent and accurate evaluations of projects and proposals.

The following process will be used to make awards for the program:

- DHS/FEMA will verify compliance with each of the administrative and eligibility criteria identified in the application kit.
- Eligible applications will be reviewed and scored by the NRP. Each panelist will independently review each application and score it based on the above criteria using a standard scoring sheet.
- The NRP will meet to review and compare scores and discuss project criteria. Each panelist will then confirm their final scores. Panelist scores will be averaged to obtain scores for each criterion on each project.
- DHS/FEMA will calculate a total score for each project. The total score will consist of the sum of the Funding Guidelines score (0-20), Cost Effectiveness score (0-15), Risk

- Reduction score (0-35), Sustainability score (0-10), Timeline score (0-10), and Risk to Critical Infrastructure score calculated by TSA (0-10).
- The NRP results, scoring summary, and funding recommendations, will be reviewed by an Executive Committee made up of senior leadership from DHS/FEMA and TSA.
- The output of the Executive Committee review will be the final slate of recommended projects, the associated funding recommendations and official comments and justifications. DHS/FEMA and TSA will brief the final results of the Executive Committee's review, approved projects and funding recommendations to senior DHS leadership through multiple briefings.
- Ultimately, IBSGP authorizing statutes place final funding determinations at the discretion of the Secretary of Homeland Security.
- The final slate of approved projects will then be forwarded to GPD for final award processing.
- DHS/FEMA may conduct additional pre-award vetting of proposed recipients, to include: (1) whether any of the bus companies have been declared an "imminent hazard" or fined by either the Federal or any state department of transportation and (2) whether any of the bus company owner/operators have been convicted of human trafficking or criminally transporting illegal immigrants on buses.

F. Federal Award Administration Information

Notice of Award

Notification of award approval is made through the ND Grants system through an automatic email to the recipient's authorized official listed in the initial application. The "award date" for IBSGP awards will be the date that FEMA approves the award. The recipient should follow the directions in the notification to confirm acceptance of the award.

Funds will remain on hold until the applicant accepts the award through ND Grants and all other conditions of award have been satisfied or the award is otherwise rescinded. Failure to accept the grant award within the 90-day timeframe may result in a loss of funds.

Recipients must accept their awards no later than 90 days from the award date. The recipient shall notify FEMA of its intent to accept and proceed with work under the award or provide a written notice of intent to decline. Instructions on accepting or declining an award in the ND Grants System can be found in the ND Grants Grantee Training Manual.

Administrative and National Policy Requirements

All successful applicants for all DHS grants and cooperative agreements are required to comply with DHS Standard Administrative Terms and Conditions, which are available online at: DHS Standard Terms and Conditions

The applicable DHS Standard Administrative Terms and Conditions will be those in effect at the time the award was made.

Before accepting the award, the AOR should carefully review the award package. The award package includes instructions on administering the grant award and the terms and conditions associated with responsibilities under Federal awards. The applicant must accept all conditions

in this NOFO as well as any Special Terms and Conditions in the Notice of Award to receive an award under this program.

Reporting

Recipients are required to submit various financial and programmatic reports as a condition of their award acceptance. Future awards and funds drawdown may be withheld if these reports are delinquent.

Federal Financial Reporting Requirements

Federal Financial Report (FFR)

Recipients must report obligations and expenditures on a quarterly basis through the FFR (SF-425) to DHS/FEMA. Recipients must file the FFR electronically using the Payment and Reporting System (PARS). A FFR report must be submitted quarterly throughout the period of performance, including partial calendar quarters, as well as for periods where no grant award activity occurs. Future awards and fund drawdowns may be withheld if these reports are delinquent, demonstrate lack of progress, or are insufficient in detail.

Recipients may review the Federal Financial Reporting Form (FFR) (SF-425) here: https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html#sortby=1.

Financial Reporting Periods and Due Dates

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

Reporting Period	Report Due Date
October 1 – December 31	January 30
January 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30

Financial and Compliance Audit Report

For audits of fiscal years beginning on or after December 26, 2014, all recipients other than for-profit entities that expend \$750,000 or more from all Federal funding sources during their fiscal year are required to submit an organization-wide financial and compliance audit report. The audit must be performed in accordance with the requirements of GAO's Government Auditing Standards, located at http://www.gao.gov/govaud/ybk01.htm, and the requirements of Subpart F of 2 C.F.R. Part 200, located at http://www.ecfr.gov/cgi-bin/text-idx?node=sp2.1.200.f

Program Performance Reporting Requirements

Performance Progress Report (PPR)

Recipients are responsible for providing updated performance progress reports on a biannual basis as an attachment in the ND Grants system.

The PPR should include the following:

• Status Summary: The summary should

- o Provide a brief narrative of the overall project status
- o Identify accomplishments and milestones achieved as they relate to the approved project and
- o Describe any potential issues that may affect project completion.
- Best Practices/Lessons Learned Summary: The summary should describe any best practices or lessons learned identified to date through the program. The purpose of this information is to develop and enhance guidance materials, tools, templates, and lessons learned and best practices summaries.
- Issues List: The list should identify any program-related challenges that may require assistance or impact successful and on time completion of the funded project.

The PPR should document accomplishments as they relate to the approved investment justification, milestones achieved, overall project status, and any potential issues that may affect project completion.

Performance Reporting Periods and Due Dates

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

Reporting Period	Report Due Date
January 1 – June 30	July 30
July 1 – December 31	January 30

Closeout Reporting Requirements

FEMA will close out the grant award when it determines that all applicable administrative actions and all required work of the IBSGP award have been completed by the recipient. This section summarizes the actions that the recipient must take to complete the closeout process in accordance with 2 C.F.R. § 200.343 at the end of the grant's period of performance or the issuance of a Grant Amendment Notice issued to close out the grant.

Within 90 days after the end of the period of performance, or after an amendment has been issued to close out a grant, whichever comes first, recipients must submit a final FFR and final progress report detailing all accomplishments and a qualitative summary of the impact of those accomplishments throughout the period of performance, as well as the following documentation:

- 1) Final request for payment, if applicable;
- 2) SF-425 Final Federal Financial Report;
- 3) Final Performance Progress Report detailing project accomplishments throughout the period of performance with ties back to the original gaps laid out in the investment justification(s);
- 4) A qualitative narrative summary on the impact of those accomplishments throughout the entire period of performance submitted to the respective FEMA HQ Program Analyst; and
- 5) Other documents required by program guidance or terms and conditions of the award.

Additionally, recipients must liquidate all obligations incurred under the IBSGP award no later than 90 calendar days after the end date of the period of performance or issuance of a Grant Amendment Notice that closes out the award, whichever comes first. If the recipient fails to liquidate their obligations within this time period, FEMA may disallow the costs associated with those unliquidated obligations. Recipients also are responsible for promptly returning to DHS/FEMA the balance of any funds that have been drawn down but remain unliquidated.

After these reports have been reviewed and approved by DHS/FEMA, a close-out notice will be completed. The notice will indicate the period of performance as closed, list any remaining funds the recipient has not drawn down that will be deobligated, address requirements for record retention, and explain disposition and reporting requirements for any equipment or real property purchased using IBSGP funding.

If DHS/FEMA has made reasonable attempts through multiple contacts to close out awards within the required 180 days, DHS/FEMA may waive the requirement for a particular report and administratively close the award. If this action is taken, consideration for subsequent awards to the recipient may be affected.

Disclosing Information Per 2 C.F.R. § 180.335

This reporting requirement pertains to disclosing information related to government-wide suspension and debarment requirements. Before a recipient enters into a grant award with FEMA, the recipient must notify FEMA if it knows if any of the recipient's principals under the award fall under one or more of the four criteria listed at 2 C.F.R. § 180.335. At any time after accepting the award, if the recipient learns that any of its principals falls under one or more of the criteria listed at 2 C.F.R. § 180.335, the recipient must provide immediate written notice to FEMA in accordance with 2 C.F.R. § 180.350.

G. DHS Awarding Agency Contact Information

Contact and Resource Information

Centralized Scheduling and Information Desk (CSID)

CSID is a non-emergency comprehensive management and information resource developed by DHS/FEMA for grants stakeholders. CSID provides general information on all DHS/FEMA grant programs and maintains a comprehensive database containing key personnel contact information at the Federal, state, and local levels. When necessary, recipients will be directed to a Federal point of contact who can answer specific programmatic questions or concerns. CSID can be reached by phone at (800) 368-6498 or by e-mail at askesid@fema.gov, Monday through Friday, 9:00am-5:00pm ET.

Grant Programs Directorate Grant Operations Division

GPD's Grant Operations Division Business Office provides support regarding financial matters and budgetary technical assistance. Additional guidance and information can be obtained by contacting the FEMA Call Center at (866) 927-5646 or via e-mail to <u>ASK-GMD@fema.gov</u>.

FEMA Regional Offices

DHS/FEMA Regional Offices also may provide fiscal support, including pre- and post-award administration and technical assistance such as conducting cash analysis, financial monitoring, and audit resolution to the grant programs included in this solicitation. GPD will provide programmatic support and technical assistance. FEMA Regional Office contact information is available here.

GPD Environmental Planning and Historic Preservation (GPD EHP)

The DHS/FEMA GPD EHP Team provides guidance and information about the EHP review process to recipients and subrecipients. All inquiries and communications about GPD projects or the EHP review process, including the submittal of EHP review materials, should be sent to gpdehpinfo@fema.gov. GPD EHP information can be found at: https://www.fema.gov/media-library/assets/documents/85376. See also Environmental-Planning and Historic Preservation (EHP) Compliance in this NOFO.

Systems Information

Grants.gov

For technical assistance with <u>Grants.gov</u>, please call the <u>Grants.gov</u> customer support hotline at (800) 518-4726.

Non-Disaster (ND) Grants

For technical assistance with the ND Grants system, please contact the ND Grants Helpdesk at ndgrants@fema.gov or (800) 865-4076, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

Payment and Reporting System (PARS)

DHS/FEMA utilizes the <u>Payment and Reporting System (PARS)</u> for financial reporting, invoicing and tracking payments. DHS/FEMA uses the Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment to recipients. To enroll in the DD/EFT, the recipients must complete a Standard Form 1199A, Direct Deposit Form.

H. Additional Information

National Preparedness

DHS/FEMA coordinates with local, state, territory, tribal, governments as well as the private and non-profit sectors to facilitate a whole community, risk driven, and capabilities-based approach to preparedness. This approach is grounded in the identification and assessment of risk through the Threat and Hazard Identification and Risk Assessment (THIRA) process. For additional information on the THIRA, please refer to the following website: http://www.fema.gov/threat-and-hazard-identification-and-risk-assessment. Information on the National Preparedness System Description which is posted on the DHS/FEMA website at http://www.fema.gov/national-preparedness-system. Additional details regarding the National Preparedness System and how it is supported by IBSGP can be found in Appendix B - FY 2018 IBSGP Priorities.

Active Shooter Preparedness

DHS aims to enhance national preparedness through a whole community approach by providing the necessary products, tools, and resources to help all stakeholders prepare for and respond to an active shooter incident. To that end, DHS has developed a comprehensive "Active Shooter Preparedness" website, which includes a variety of informational resources. The website address is: https://www.dhs.gov/active-shooter-preparedness.

In addition, within the Homeland Security Information Network (HSIN), the Joint DHS and FBI Countering Violent Extremism (CVE) and Active Shooter Web Portal provides a restricted-access forum to share Unclassified For Official Use Only (FOUO), Sensitive but Unclassified (SBU), and Law Enforcement Sensitive (LES) Information. The portal provides users and training practitioners with accurate, appropriate, and relevant CVE and Active Shooter training development resources, subject matter expert information, and outreach initiatives. It also has forums to provide feedback, products useful to others, and allows participants to ask questions concerning CVE or the Active Shooter Program. Persons with a job-related duty, public service interest, or who support a CVE and/or Active Shooter program can request access into this Portal. Additional information can be found on the DHS website at: https://www.dhs.gov/cveas-portal#.

Intercity bus security stakeholders are encouraged to review the referenced active shooter guidance, evaluate their preparedness needs, and consider applying for IBSBP funding to address any capability gaps identified in this area subject to the allowable costs outlined in Appendix C - FY 2018 Funding Guidelines.

Soft Targets and Crowded Places

There are continued and growing threats facing Soft Targets and Crowded Places (ST-CP) throughout the nation. ST-CPs are those locations or environments that are easily accessible to large numbers of people on a predictable or semi-predictable basis that have limited security or protective measures in place. These locations are vulnerable to attack using simple tactics and readily accessible weapons such as small arms, edged weapons, and vehicles as a weapon, improvised explosive devices, and unmanned aerial systems. ST-CPs can include places such as town centers, shopping malls, open-air venues, outside hard targets/venues perimeters, and other places of meeting and gathering. DHS is committed to reducing the risk of attacks against ST-CPs and the impact of attacks if they do occur. However, the protection and security of ST-CPs is a shared responsibility among whole community partners including: the public, ST-CP owners and operators, security industry partners, the Federal Government, and State, local, tribal, and territorial (SLTT) government partners. States, territories, urban areas, and public and private sector partners are encouraged to identify security gaps and build capabilities that address security needs of ST-CP, understanding the unique challenges related to protecting locations that are open to the public. States, territories, urban areas, and public and private sector partners are also encouraged to use resources to instill a culture of awareness, vigilance, and preparedness. For more information and additional resources please see the Department of Homeland Security's (DHS's) Hometown Security Program.

Procurement Integrity

Through audits conducted by DHS Office of Inspector General (OIG) and FEMA grant monitoring, findings have shown that some FEMA recipients have not fully adhered to the

proper procurement requirements when spending grant funds. Anything less than full compliance with Federal procurement policies jeopardizes the integrity of the grant as well as the grant program. Noncompliance with the Federal procurement rules may result in FEMA imposing specific conditions as described in 2 C.F.R. § 200.207 or other remedies for noncompliance under 2 C.F.R. § 200.338.

The below highlights the Federal procurement requirements for FEMA recipients when procuring goods and services with Federal grant funds. DHS will include a review of recipients' procurement practices as part of the normal monitoring activities. All procurement activity must be conducted in accordance with Federal Procurement Standards at 2 C.F.R. §§ 200.317 – 200.326. Select requirements under these standards are listed below. The recipient must comply with all requirements, even if they are not listed below.

Under 2 C.F.R. § 200.317, when procuring property and services under a Federal award, states must follow the same policies and procedures they use for procurements from their non-Federal funds; additionally, states must follow 2 C.F.R. § 200.322 regarding procurement of recovered materials, and 2 C.F.R. § 200.326 regarding required contract provisions.

All other non-Federal entities, such as tribes, must use their own documented procurement procedures which reflect applicable state, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in 2 C.F.R. Part 200. These standards include but are not limited to providing for full and open competition consistent with the standards of 2 C.F.R. § 200.319.

Competition and Conflicts of Interest

Among the requirements of 2 C.F.R. § 200.319(a) applicable to all non-Federal entities other than States, in order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. FEMA considers this an organizational conflict of interest and interprets this restriction as applying to contractors that help a recipient develop its grant application, project plans, or project budget. This prohibition also applies to the use of former employees to manage the grant or carry out a contract when such former employees worked on such activities while they were employees of the non-Federal entity.

Under this prohibition, unless the non-Federal entity solicits for and awards a contract covering both development <u>and</u> execution of specifications (or similar elements as described above), and this contract was procured in compliance with 2 C.F.R. §§ 200.317 – 200.326, Federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of such specifications. This rule applies to all contracts funded with Federal grant funds, including pre-award costs, such as grant writer fees, as well as post-award costs, such as grant management fees. For more information on grant writer and grant management costs, see Section D.

Additionally, some of the situations considered to be restrictive of competition include, but are not limited to:

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

Pursuant to 2 C.F.R. § 200.319(b), non-Federal entities other than states must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

Pursuant to 2 C.F.R. § 200.318(c)(1), non-Federal entities other than states are required to maintain written standards of conduct covering conflicts of interest and governing the actions of their employees engaged in the selection, award, and administration of contracts. **No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.** Such conflicts of interest would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

If the recipient or subrecipient (other than states) has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. In this context, organizational conflict of interest means that because of a relationship with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. The non-Federal entity must disclose in writing any potential conflicts of interest to FEMA or the pass-through entity in accordance with applicable FEMA policy.

Supply Schedules

Generally, a non-Federal entity may seek to procure goods or services from a Federal supply schedule, state supply schedule, or group purchasing agreement. State and local governments may procure goods and services from a General Services Administration (GSA) schedule. Information about GSA programs for state and local governments can be found at https://www.gsa.gov/resources-for/programs-for-state-and-local-governments. For local governments that purchase off a GSA schedule, this will satisfy the Federal requirements for full and open competition provided that the recipient follows the GSA ordering procedures; however, local governments will still need to follow the other rules under 2 C.F.R. §§ 200.317 – 200.326, such as contract cost and price (§ 200.323) and solicitation of minority, women-owned, or small businesses (§ 200.321).

For non-Federal entities other than states, such as tribes, that want to procure goods or services from a state supply schedule, cooperative purchasing program, or other similar program, in order for such procurements by to be permissible, the following must be true:

- The procurement of the original contract or purchasing schedule and its use by the recipient complies with state and local law, regulations, and written procurement procedures.
- The state or other entity that originally procured the original contract or purchasing schedule entered into the contract or schedule with the express purpose of making it available to the recipient and other similar types of entities.
- The contract or purchasing schedule specifically allows for such use, and the work to be performed for the non-Federal entity falls within the scope of work under the contract as to type, amount, and geography.
- The procurement of the original contract or purchasing schedule complied with all of the procurement standards applicable to a non-Federal entity other than states under at 2 C.F.R. §§ 200.317 200.326.
- With respect to the use of a purchasing schedule, the recipient must follow ordering procedures that adhere to state and local laws and regulations and the minimum requirements of full and open competition under 2 C.F.R. Part 200.

If a non-Federal entity other than a state seeks to use such a state supply schedule, cooperative purchasing program, or other similar type of arrangement, it is recommended that recipients discuss their procurement plans with the FEMA Grant Programs Directorate.

Documentation

Non-Federal entities are required to maintain and retain the following:

- Backup documentation, such as bids and quotes.
- Cost/price analyses on file for review by Federal personnel, if applicable.
- Other documents required by Federal regulations applicable at the time a grant is awarded to a recipient.

FEMA requires that non-Federal entities maintain the following documentation for Federally funded purchases:

- Specifications
- Solicitations

- Competitive quotes or proposals
- Basis for selection decisions
- Purchase orders
- Contracts
- Invoices
- Canceled checks

Non-Federal entities should keep detailed records of all transactions involving the grant. FEMA may at any time request copies of purchasing documentation along with copies of canceled checks for verification.

Non-Federal entities who fail to fully document all purchases will find their expenditures questioned and subsequently disallowed.

Monitoring and Evaluation

Recipients will be monitored on an annual and as needed basis by DHS/FEMA staff, both programmatically and financially, to ensure that the project goals, objectives, performance requirements, timelines, milestone completion, budgets, and other related program criteria are being met.

Monitoring may be accomplished through either a desk-based review or on-site monitoring visits, or both. Monitoring will involve the review and analysis of the financial, programmatic, performance, compliance and administrative processes, policies, activities, and other attributes of each Federal assistance award and will identify areas where technical assistance, corrective actions and other support may be needed.

As part of its grant oversight responsibility, FEMA is conducting a series of grant effectiveness case studies jointly with grant recipients to highlight how states and urban areas have used federal grants to improve preparedness. The purpose of the project is to better understand the factors that grant recipients consider when determining which grant projects to fund, understand how recipients measure grant effectiveness, and document key findings and success stories that will help both grant recipients and FEMA more effectively communicate the importance of Federal grant programs to policymakers and the public. Although not mandatory, recipients are encouraged to participate given the mutual benefits to be gained from this collaborative effort.

Conflicts of Interest in the Administration of Federal Awards and Subawards For conflicts of interest under grant-funded procurements and contracts, please refer to the section on Procurement Integrity in this NOFO and 2 C.F.R. §§ 200.317 – 200.326.

To eliminate and reduce the impact of conflicts of interest in the subaward process, recipients must follow their own policies and procedures regarding the elimination or reduction of conflicts of interest when making subawards. Recipients are also required to follow any applicable state, local, or tribal statutes or regulations governing conflicts of interest in the making of subawards.

The recipient must disclose to DHS/FEMA, in writing, any real or potential conflict of interest as defined by the Federal, state, local, or tribal statutes or regulations or their own existing policies, which may arise during the administration of the Federal award. Recipients must disclose any

real or potential conflicts to the FEMA HQ Program Analyst within five days of learning of the conflict of interest.

Conflicts of interest may arise during the process of DHS/FEMA making a Federal award in situations where an employee, officer, or agent, any members of his or her immediate family, or his or her partner has a close personal relationship, a business relationship, or a professional relationship, with an applicant, subapplicant, recipient, subrecipient, or DHS/FEMA employees.

Extensions

Period of Performance Extensions

Extensions to the initial period of performance identified in the award will only be considered through formal, written requests to the relevant FEMA HQ Program Analyst and must contain specific and compelling justifications as to why an extension is required. IBSGP recipients are advised to coordinate with the FEMA HQ Program Analyst as needed, when preparing an extension request. All extension requests must address the following:

- 1) Grant Program, Fiscal Year, and award number;
- 2) Reason for delay this must include details of the legal, policy, or operational challenges being experienced that prevent the final outlay of awarded funds by the applicable deadline;
- 3) Current status of the activity/activities;
- 4) Approved period of performance termination date and new project completion date;
- 5) Amount of funds drawn down to date;
- 6) Remaining available funds, both Federal and non-Federal;
- 7) Budget outlining how remaining Federal and non-Federal funds will be expended;
- 8) Plan for completion, including milestones and timeframes for achieving each milestone and the position/person responsible for implementing the plan for completion; and
- 9) Certification that the activity/activities will be completed within the extended period of performance without any modification to the original Statement of Work, as described in the investment justification and approved by DHS/FEMA.

Extension requests will be granted only due to compelling legal, policy, or operational challenges. Extension requests will only be considered for the following reasons:

- Contractual commitments by the grant recipient with vendors or subrecipients prevent completion of the project within the existing Period of Performance;
- The project must undergo a complex environmental review that cannot be completed within this timeframe;
- Projects are long-term by design and therefore acceleration would compromise core programmatic goals; and
- Where other special circumstances exist.

Recipients must submit all proposed extension requests to DHS/FEMA for review and approval no later than 120 days prior to the end of the period of performance. In accordance with GPD policy, extensions typically are granted for no more than a six-month time period.

Appendix A – FY 2018 IBSGP UASI-Eligible Urban Areas

State/Territory	Funded Urban Area
Arizona	Phoenix Area
California	Anaheim/Santa Ana Area
	Bay Area
	Los Angeles/Long Beach Area
	Riverside Area
	Sacramento Area
	San Diego Area
Colorado	Denver Area
District of Columbia	National Capital Region
Florida	Miami/Fort Lauderdale Area
	Orlando Area
	Tampa Area
Georgia	Atlanta Area
Hawaii	Honolulu Area
Illinois	Chicago Area
Maryland	Baltimore Area
Massachusetts	Boston Area
Michigan	Detroit Area
Minnesota	Twin Cities Area
Missouri	St. Louis Area
Nevada	Las Vegas Area
New Jersey	Jersey City/Newark Area
New York	New York City Area
North Carolina	Charlotte Area
Oregon	Portland Area
Pennsylvania	Philadelphia Area
	Pittsburgh Area
Texas	Dallas/Fort Worth/Arlington Area
	Houston Area
	San Antonio Area
Virginia	Hampton Roads Area
Washington	Seattle Area

Appendix B – FY 2018 IBSGP Priorities

The Alignment of IBSGP to the National Preparedness System

The FY 2018 IBSGP contributes to the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities.

The FY 2018 IBSGP emphasizes capabilities that address the greatest risks to the security and resilience of the United States, and the greatest risks along the Nation's borders.

The FY 2018 IBSGP supports investments that improve the ability of organizations 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; and/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, improved training and exercise programs, promote innovation, and appropriate administrative, finance, and logistics systems.

Additional information on the National Preparedness System is available at http://www.fema.gov/national-preparedness-system.

Building and Sustaining Capabilities

The FY 2018 IBSGP focuses on the development and sustainment of core capabilities as outlined in the Goal. Particular emphasis will be placed on building and sustaining capabilities that address high consequence events that pose the greatest risk to the security and resilience of the United States and that can be utilized nationwide.

Capabilities are the means to accomplish a mission, function, or objective based on the performance of related tasks, under specified conditions, to target levels of performance. The most essential capabilities are the core capabilities identified in the Goal.

Working together, individuals, government officials, and elected leaders can develop plans to allocate resources effectively and reduce risk. For these plans to be effective, those involved must consider methods to reduce and manage risk as well as how to sustain appropriate levels of capability and address potential gaps in order to achieve the Goal.

Achieving the Goal will require participation and resources from the whole community. Not all capabilities can be addressed in a given local, state, or Federal funding cycle, nor can funding be expected to flow from any one source. Officials must prioritize the achievement of certain

capabilities to most effectively ensure their security and resilience while understanding the effects of not addressing other identified needs. Building and sustaining capabilities will include a combination of organizational resources, equipment, training, and education. Consideration must also be given to finding, connecting to, and strengthening community resources by using the expertise and capacity of the whole community: individuals, communities, private and non-profit sectors, faith-based organizations, and all levels of government. Jurisdictions must also use mutual aid agreements to fill needs and work with partners to develop regional capabilities. Ultimately, a jurisdiction may need to rely on other levels of government or partners to address a particular need. This expectation should be communicated well before an event occurs when the capabilities are most urgently needed.

Strengthening Governance Integration

DHS 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.

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

- *Prioritization of Investments* resources must be allocated to address the most critical capability needs.
- *Transparency* 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 DHS grants support, must include local government representatives. At the state and regional levels, local risk assessments must be included in the overarching analysis to account for the threats and hazards of greatest concern to the jurisdiction.
- Accountability FEMA recognizes that unique preparedness gaps exist at the local level. However, recipients are responsible for ensuring the effective use of funds to address those gaps and for maintaining and sustaining existing capabilities.
- Support of Regional Coordination Inter/intra-state partnerships and dependencies at the state and regional level, including those within metropolitan areas, must be recognized.
- Linkages to Vulnerability Assessment Proposed projects should be clearly linked to vulnerabilities identified in the applicant's Vulnerability Assessment/Security Plan.

Validating Capabilities

Exercises implemented with grant funds should examine, validate, and/or address the performance of capability against the level of capabilities required. Grant recipients should develop and maintain a progressive exercise program consistent with Homeland Security Exercise and Evaluation Program (HSEEP) https://www.fema.gov/HSEEP and in support of

the National Exercise Program (NEP). The National Exercise Program (NEP) is critical to our Nation's ability to test and validate core capabilities. Grant recipients are highly encouraged to nominate exercises into the two year NEP cycle. For additional information on the NEP, please refer to http://www.fema.gov/national-exercise-program.

Recipients shall submit their After Action Report/Improvement Plan (AAR/IP) Template to the HSEEP inbox (HSEEP@fema.dhs.gov) and indicate the applicable IBSGP grant year which the submission is intended to fulfill. If the recipient submits a single AAR/IP to cover an IBSGP progressive exercise series, the recipient must then specify the applicable IBSGP grant year and the dates of the exercises in their submission to the HSEEP inbox (HSEEP@fema.dhs.gov). Submission of the AAR/IP shall be no later than 90 after completion of the single exercise or progressive series.

In accordance with HSEEP guidance, grant recipients are reminded of the importance of implementing corrective actions iteratively throughout the progressive exercise cycle. This link provides access to a sample AAR/IP template: https://preptoolkit.fema.gov/web/hseep-resources/improvement-planning. Recipients are encouraged to enter their exercise data and AAR/IP in the Preparedness Toolkit at https://preptoolkit.fema.gov/web/hseep-resources. DHS/FEMA will release additional guidance on the Preparedness Toolkit, including how to enter exercise data and develop and enter an AAR/IP, later in 2018.

Appendix C – FY 2018 IBSGP Funding Guidelines

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

Pre-award costs are allowable only with the prior written consent of DHS/FEMA and if they are included in the award agreement and are limited to \$1,500 for grant writing contract support.

The following pages outline general allowable and unallowable IBSGP cost guidance.

Allowable Costs

Planning

IBSGP funds may be used for the following types of planning activities:

- Development and enhancement of security plans and protocols
- Materials required to conduct planning activities
- Other project planning activities with prior approval from DHS/FEMA

Management and Administration (M&A). M&A Activities are those costs directly relating to the management and administration of IBSGP grants, such as financial management, recordkeeping, filing required quarterly and semi-annual reports, responding to audits and informational inquiries, and project monitoring. These costs are incurred throughout the grant lifecycle. They should be tracked in the recipient's financial system and reimbursed as they are incurred rather than as a lump sum payment request at the beginning or end of the grant lifecycle.

M&A costs may not exceed five percent (5%) of the total grant award. Any M&A costs associated with individual projects submitted for consideration of funding under the FY 2018 IBSGP must be included in the budget for that project. M&A costs associated with managing the overall IBSGP award itself must be accounted for separately. This includes:

- Hiring of full-time or part-time staff or contractors/consultants responsible for activities relating to the management and administration of IBSGP funds
- Meeting-related expenses directly related to M&A of IBSGP funds

Indirect Costs. Indirect costs are allowable only if the applicant has an approved indirect cost rate with its cognizant Federal agency. A copy of the approved rate (a fully executed agreement negotiated with the applicant's cognizant Federal agency) is required at the time of application. Indirect costs will be evaluated as part of the application for Federal funds to determine if they are allowable and reasonable.

Equipment

Facility Security Enhancements

FY 2018 IBSGP funds may be used for the following facility security enhancement costs:

- Capital Projects. Grant funds may be used on projects that focus on lighting, fencing, securing gates, door access codes, cameras, etc.
- Full or Part-Time Staff or Contractors/Consultants. Full or part-time staff or contractors/consultants may be hired to support facility security enhancement-related activities. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant.

<u>Please Note</u>: Camera, video surveillance, and alarm systems MUST either be live monitored 24/7 or have the capability for real-time incident-based monitoring. Systems that do not clearly specify live monitoring in the IJ will not be funded.

Vehicle/Driver Security Enhancements

FY 2018 IBSGP funds may be used for the following costs:

- Vehicle Security Enhancements focus on vehicle disabling and anti-theft devices, real-time bus inventory and inventory control, tracking, monitoring, and locating technologies. Driver security enhancements focus on protection for the bus driver to prevent would-be terrorists from immobilizing the driver and/or hijacking the bus. Applicants are discouraged from submitting projects that propose the use of CCTV alone as an on-board deterrent to terrorism. Rather, any cameras should have the capability and protocols in place for incident-based real-time monitoring.
- Full or Part-Time Staff or Contractors/Consultants. Full or part-time staff or contractors/consultants may be hired to support security enhancement-related activities. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant.

<u>Please Note</u>: Camera, video surveillance, and panic button systems MUST either be live monitored 24/7 or have the capability for real-time incident-based monitoring. Systems that do not clearly specify live monitoring in the IJ will not be funded.

Other Authorized Expenditures

A comprehensive listing of allowable equipment categories and types is found in the DHS Authorized Equipment List (AEL). These costs include:

- Personal protection equipment
- Interoperable communications equipment
- Detection equipment
- Terrorism incident prevention equipment
- Physical security enhancement equipment

EXAMPLES:

 Establishing or improving emergency communication systems linking drivers and over-the-road buses to company operation centers, law enforcement agencies or emergency response personnel.

- Acquiring and installing equipment or systems that collect, store or exchange passenger and/or driver information with established government databases for security purposes.
- Implementing and operating established methodologies for screening passengers, their carry-on baggage, and/or their checked baggage, for weapons and/or explosives

<u>Note</u>: Unless otherwise noted, equipment must be certified that it meets required regulatory and/or DHS-adopted standards to be eligible for purchase using these funds. Equipment must comply with the Occupational Safety and Health Administration (OSHA) requirement for certification of electrical equipment by a nationally recognized testing laboratory, and demonstrate compliance with relevant DHS-adopted standards through a supplier's declaration of conformity with appropriate supporting data and documentation per ISO/IEC 17050, parts 1 and 2. In addition, agencies must have all necessary certifications and licenses for the requested equipment, as appropriate, prior to the request.

Construction and Renovation

For construction costs to be allowed, they must be approved by DHS/FEMA in writing prior to the use of any IBSGP funds for construction or renovation. Additionally, recipients are required to submit a SF-424C Form and Budget detail citing the project costs.

Construction projects are permitted only where they will assist intercity bus agency operators achieve capability targets related to preventing, preparing for, protecting against, or responding to acts of terrorism, including through the alteration or remodeling of existing buildings for the purpose of making them secure against acts of terrorism.

Recipients are 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 (EA) may be needed, as defined in DHS Instruction Manual 023-01-001-01, Revision 01, FEMA Directive 108-1 and FEMA Instruction 108-1-1, must also be identified to the DHS/FEMA Program Analyst 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.

IBSGP recipients using funds for construction projects must comply with the *Davis-Bacon Act* (40 U.S.C. § 3141 *et seq.*). Grant recipients must ensure that their contractors or subcontractors for construction projects pay workers employed directly at the work-site no less than the prevailing wages and fringe benefits paid on projects of a similar character. Additional information, including Department of Labor (DOL) wage determinations, is available from the following website: https://www.dol.gov/whd/govcontracts/dbra.htm.

Training

FY 2018 IBSGP funds may be used for the following training activities:

• Training Workshops and Conferences. Grant funds may be used to plan and conduct training workshops or conferences including costs related to planning,

- meeting space and other meeting costs, facilitation costs, materials and supplies, travel, and training plan development. All training courses must adhere to the DHS/FEMA Grant Programs Directorate Policy <u>FP 207-008-064-1</u>.
- Full or Part-Time Staff or Contractors/Consultants. Full or part-time staff may be hired to support training-related activities. The services of contractors/consultants may also be procured in the design, development, conduct, and evaluation of Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE) training. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant.
- Overtime and Backfill Costs. Overtime and backfill costs associated with the design, development, and conduct of training are allowable expenses. Payment of overtime expenses will be for work performed by recipient or subrecipient employees in excess of the established work week related to the planning and conduct of the training project(s). Furthermore, overtime payments and backfill costs associated with sending personnel to training are allowable. Grant funds cannot be used for personnel or direct salary costs for employees to attend training sessions. Recipients seeking to claim overtime or backfill costs will be required to submit verification. Straight time costs are not eligible expenses.
- **Travel.** Domestic travel costs (i.e., airfare, mileage, per diem, hotel, etc.) are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of the training project(s) or for attending courses. These costs must be in accordance with applicable state law and regulations.
- **Supplies.** Supplies are items that are expended or consumed during the course of the planning and conduct of the training project(s) (e.g., copying paper, gloves, tape, and non-sterile masks).
- Other Items. These costs include the rental of space/locations for planning and conducting training, badges, etc. Recipients are encouraged to use free public space/locations, whenever available, prior to the rental of space/locations.

FY 2018 IBSGP funds may be not used for the following training activities:

- Personnel costs (except as detailed above)
- Food or refreshments during training sessions
- International travel costs to attend training

When completing a training IJ, the following must be addressed, as applicable:

- Include a course syllabus, curriculum, or topic plan identifying the proposed course material and contents
- Provide the total cost of the training course, the number of participants, and the cost per participant breakdown

Exercises

2018 IBSGP funds may be used for the following exercise activities:

• Exercise Planning meetings. Grant funds may be used to plan and conduct Exercise Planning meetings including costs related to planning, meeting space and other

- meeting costs, facilitation costs, materials and supplies, travel, and exercise plan development.
- **Contractors/Consultants.** Contractors/Consultants staff may be hired to support exercise-related activities. The services of contractors/consultants may also be procured to support the design, development, conduct, and evaluation of terrorism exercises.
- Overtime and Backfill Costs. Overtime and backfill costs associated with the design, development, and conduct of terrorism exercises are allowable expenses. Payment of overtime expenses will be for work performed in excess of the established work week related to the planning and conduct of the exercise project(s). Further, overtime payments and backfill costs associated with sending personnel to exercises are allowable, provided that the event being attended is a DHS sponsored exercise. Grant funds cannot be used for personnel or straight salary costs for employees to attend exercises. Recipients seeking to claim overtime or backfill costs will be required to submit verification. Straight time costs are not eligible expenses.
- **Travel.** Domestic travel costs (i.e., airfare, mileage, per diem, hotel, etc.) are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of the exercise project(s). These costs must be in accordance with applicable state law and regulations.
- **Supplies.** Supplies are items that are expended or consumed during the course of the planning and conduct of the exercise project(s) (e.g., copying paper, gloves, tape, non-sterile masks, and disposable protective equipment).
- Other Items. These costs include the rental of space/locations for exercise planning and conduct, exercise signs, badges, etc. Recipients are encouraged to use free public space/locations, whenever available, prior to the rental of space/locations.

Unallowable Costs

The following projects and costs are considered **ineligible** for award consideration:

- General-use facility expenditures, including backup or emergency generators
- Overtime and backfill (except as detailed above)
- Initiatives that do not address the implementation of programs/initiatives to build prevention and protection-focused capabilities directed at identified facilities and/or the surrounding communities
- Organizational operating expenses
- Reimbursement for pre-award costs (except as detailed above)
- Expenditures for items such as general-use software (word processing, spreadsheet, graphics, etc.), general-use computers and related equipment (other than for allowable M&A activities, or otherwise associated preparedness or response functions), general-use vehicles, licensing fees, recurring operating costs (e.g., cell phone services, maintenance contracts, etc.), weapons systems, and ammunition
- Activities unrelated to the completion and implementation of projects approved under the IBSGP
- Personnel costs (except as detailed above)
- Maintenance costs and agreements
- Monthly service charges, recurring costs, or fixed rate consultant contracts
- Other indirect costs (i.e., property purchase, depreciation, or amortization expenses)

- Initiatives in which Federal agencies are the beneficiary or that enhance Federal property
- Initiatives which study technology development
- Proof-of-concept initiatives
- Initiatives that duplicate capabilities being provided by the Federal government

Appendix D – FY 2018 IBSGP Investment Justification and Budget Template

Investment Heading	
State	
Bus System Name	
Urban Area(s) Served	
Investment Name	
Investment Phase	
Requested Amount	\$

I. Background

<u>Note</u>: This section only needs to be completed once per application. The information in this section provides background/context for the investment requested but does not represent the evaluation criteria used by DHS for rating individual investment proposals. It will also be used to confirm eligibility.

I.A. Identify the bus system and that system's point(s) of contact (POC) and Chief Executive Officer (CEO), as well as the POC and CEO for additional bus systems/partners **Response Instructions** Identify the following: Company USDOT Number: • POC's name and title; POC's full mailing address; • POC's telephone number; • POC's fax number; POC's email address: · CEO's name; · CEO's full mailing address; • CEO's telephone number; • CEO's email address; • POC and CEO information (as above) for additional bus systems/partners; and • Include the corresponding information for the single authorizing official for the applicant organization--i.e., the individual authorized to sign a grant award.

I.B. Describe the extent of applicant's operations in UASI jurisdictions. (<u>Note</u> – this response will help DHS determine applicant's eligibility to participate in the FY 2018 IBSGP.)		
Response Instructions	 A list of UASI jurisdictions serviced; For charter services only, the number of trips annually to each UASI jurisdiction (must be a minimum of 50 trips); and A source, such as a web site or brochure, which would allow DHS to verify service provided. 	

I.C. Describe applicant's system infrastructure and scope of operations for fixed-route services and/or charter services.

Response Instructions

Describe the size of applicant's fleet, including a source (such as a website or brochure) which would allow DHS to verify fleet size.

For fixed-route services, address each of the following factors:

- System Infrastructure;
- Area of Operations;
- · Number of Eligible Buses;
- Number of Passengers (Annually);
- Number of Miles Driven (Annually);
- Number of Employees (Specify categories, such as drivers, administration, management, and mechanics);
- Description of Terminals/Bus Lots:
 - Number of Terminals/Bus Lots (Owned/Leased and Operated);
 - Location (street address and city) of each Terminal/Bus Lot (within which UASI jurisdiction it is located);
- Passenger Traffic for Each Terminal;
- Other tenants at Each Terminal (other bus companies); and
- Any other important system features.

For charter services, address each of the following factors:

- Company Infrastructure;
- Area of Operations;
- Number of Eligible Buses;
- Number of Passengers (Annually);
- Number of Employees (Specify categories, such as drivers, administration, management, and mechanics);
- Description of Bus Lots:
 - Number of Bus Lots (Owned/Leased and Operated);
 - Location of each Bus Lot (within which UASI jurisdiction it is located);
- Any other important features of the charter service.

II. Strategic and Program Priorities

II.A. Provide an abstract for this investment.

Response Instructions

Provide a statement summarizing this investment, addressing the following questions:

- What bus security risk will the project address?
- How will the investment address a transportation security need?
- How will the investment enhance overall system security?

II.B. Describe how the investment will address one or more of the Intercity Bus Security Fundamentals.

Response Instructions

- Describe how, and the extent to which, the proposed investment addresses one or more of the following:
 - Operating and capital costs associated with over-the-road bus security awareness, preparedness, and response training, including training for front-line employees for potential security threats and conditions as well as training developed by institutions of higher education and by non-profit employee labor organizations, for overthe-road bus employees
 - Live or simulated exercises for the purpose of assessing and improving the capabilities of entities to prevent, prepare for, mitigate, respond to, and recover from acts of terrorism
 - Public awareness campaigns for enhanced over-the-road bus security
 - Establishing and improving an emergency communications system linking drivers and over-the-road buses to the recipient's operations center or linking the operations center to law enforcement and emergency personnel.
 - Implementing and operating passenger screening programs for weapons and explosives
 - o Protecting or isolating the driver of an over-the-road bus
 - Chemical, biological, radiological, or explosive detection, including canine patrols for such detection
 - Acquiring, upgrading, installing, or operating equipment, software, or accessorial services for collection, storage, or exchange of passenger and driver information through ticketing systems or other means and for information links with government agencies, for security purposes
 - o Modifying over-the-road buses to increase their security
 - Installing cameras and video surveillance equipment on over-the-road buses and at terminals, garages, and over-the-road bus facilities
 - Constructing and modifying terminals, garages, and facilities, including terminals and other over-the-road bus facilities owned by state or local governments, to increase their security

<u>Note</u>: If this investment is for a facility security enhancement, applicants must identify the exact location of the facility. In rural areas, include information sufficient for DHS/FEMA to locate the facility with mapping software, such as GPS coordinates, nearby landmarks, nearest cross-streets, etc.

- Regardless which priority above is addressed through the investment, ensure that the response includes a justification for the approach to accomplishing stated goals and objectives. Provide an explanation that considers answering such questions as:
 - Has a security assessment been conducted? If so, identify who conducted the assessment, when it was completed, and summarize the results;
 - How does the proposed approach achieve the best possible balance of enhanced security and cost effectiveness available to applicant's organization?
 - Other unique, organization-specific factors leading to this project investment?

III. Impact

III.A. Describe how the implementation of this investment will decrease or mitigate risk. Describe how the project offers the highest risk reduction potential at the least cost. Include output and outcome metrics.

Response Instructions

- Discuss how this investment will reduce risk (e.g., reduce vulnerabilities or mitigate the consequences of an event) in a cost-effective manner by addressing the needs and priorities identified in earlier analysis and review;
- Identify the nature of the risk and how the risk and need are related to show how addressing the need through this investment will also mitigate risk (e.g., reduce vulnerabilities or mitigate the consequences of an event); and
- Outline the expected, high-level impacts this investment is expected to attain or achieve if implemented, and potential negative impacts if the investment is not implemented...
- What measurable outcomes will indicate this investment is successful?
 Include output and outcome metrics.
- What National Preparedness Goals does this address?

IV. Funding & Implementation Plan

IV.A. Investment Funding Plan.

Response Instructions

- Complete the chart below to identify the amount of funding that is being requested for this investment only;
- Funds should be requested by allowable cost categories (as identified in the FY 2018 IBSGP NOFO);
- Applicants must make funding requests that are reasonable and justified by direct linkages to activities outlined in this particular investment; and,
- Applicants must indicate whether additional funding (non-FY 2018 IBSGP) will be leveraged for this investment.

<u>Note</u>: Investments will be evaluated on the expected impact on security relative to the amount of the investment (i.e., cost effectiveness). An itemized Budget Detail Worksheet and Budget Narrative also must be completed for this investment. See Sample in this document for a sample format.

	Federal IBSGP Request	Total Match* (Cash)	Grand Total
Facility Security Enhancements			
Enhanced Ticket Identification and Passenger Screening			
Vehicle and Driver Security Enhancements			
Emergency Communications			
Public Awareness Campaigns			
Training			
Exercises			
M&A (excluding any grant writer fee)			
Grant Writer Fee (up to \$1,500)			
Total			

IV.B. Discuss funding resources beyond this fiscal year's funding that have been identified and will be leveraged to support the implementation of this investment.

Response Instructions

- Discuss other funding sources (e.g., non-IBSGP grant programs, public or private agreements, future fiscal year grants) that will contribute to the implementation of this investment; and
- If no other funding resources have been identified or if none are necessary, provide rationale as to why the requested FY 2018 IBSGP funding is sufficient for the implementation of this investment.

IV.D. Provide a high-level timeline, milestones and dates, for the implementation of this investment. Up to 10 milestones may be provided.

Response Instructions

Applicants should supply a timeline indicating the proposed milestones within the project keeping in mind the performance period on the grant is up to 36 months. The sample table below may aid the applicant.

- Only include major milestones that are critical to the success of the investment;
- While up to 10 milestones may be provided, applicants should only list as many milestones as necessary to sufficiently describe the project;
- Milestones are for this discrete investment those that are covered by the requested FY 2018 IBSGP funds and will be completed over the 36month grant period;
- Milestones should be kept to high-level, major tasks that will need to occur;
- Identify the planned start date associated with the identified milestone.

 The start date should reflect the date at which the earliest action will be taken to start achieving the milestone;
- Identify the planned completion date when all actions related to the milestone will be completed and overall milestone outcome is met; and
- List any relevant information that will be critical to the successful completion of the milestone (such as those examples listed in the question text above).
- Examples of possible milestones:
 - o Define kill switch implementation plan
 - Complete installation
 - O Complete successful test of kill switches

Sample Milestones

Sample Project Milestones	Anticipated Dates
Grant is awarded	Award Date
Recipient works on EHP and Financial clearance	Award Date + 3 months
Recipient receives confirmation that special conditions are released	Release of Funds Date
Recipient works with vendors to obtain GPS Unit contract	Release Date + 1 month
Vendor equips GPS units onto buses	Release Date + 6 months
Recipient trains staff on new GPS units	Release Date + 7 months
GPS Project is complete	Release Date + 9 months
Recipient submits final closeout documents to DHS/FEMA GPD	Release Date + 12 months

Sample Budget Detail Worksheet

Purpose. The Budget Detail Worksheet may be used as a guide to assist applicants in the preparation of the budget and budget narrative. Applicants may submit the budget and budget narrative using this form or in the format of their choosing (plain sheets, independently created forms, or a variation of this form). However, all required information (including the budget narrative) must be provided. Any category of expense not applicable to the applicant's budget may be deleted.

A. Personnel. List each position by title and name of employee, if available. Show the annual salary rate and the percentage of time to be devoted to the project. Compensation paid for employees engaged in grant activities must be consistent with that paid for similar work within the applicant organization. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant.

Name/Position	Computation	Cost
		\$
	Total Personnel	\$

B. Fringe Benefits. Fringe benefits should be based on actual known costs or an established formula. Fringe benefits are for the personnel listed in budget category (A) and only for the percentage of time devoted to the project.

Name/Position	Computation	Cost
	Total Fringe Benefits	\$

C. Travel. Itemize travel expenses of project personnel by purpose (e.g., staff to training, field interviews, advisory group meeting, etc.). Show the basis of computation (e.g., six people to 3-day training at \$X airfare, \$X lodging, \$X subsistence). In training projects, travel and meals for

trainees should be listed separately. Show the number of trainees and unit costs involved. Identify the location of travel, if known. Indicate source of any Travel Policies applied.

Purpose of Travel	Location	Item	Computation	Cost
				\$
Total Travel			\$	

D. Equipment. List non-expendable items that are to be purchased. Non-expendable equipment is tangible property having a useful life of more than one year. (Note: Organization's own capitalization policy and threshold amount for classification of equipment may be used). Expendable items should be included either in the "Supplies" category or in the "Other" category. Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high cost items and those subject to rapid technical advances. Rented or leased equipment costs should be listed in the "Contractual" category. Explain how the equipment is necessary for the success of the project. Attach a narrative describing the procurement method to be used.

Budget Narrative: Provide a narrative budget justification for each of the budget items identified.

Item	Computation	Cost
		\$
	Total Equipment	\$

E. Supplies. List items by type (office supplies, postage, training materials, copying paper, and other expendable items such as books, hand held tape recorders) and show the basis for computation. (**Note:** Organization's own capitalization policy and threshold amount for classification of supplies may be used). Generally, supplies include any materials that are expendable or consumed during the course of the project.

Supply Items	Computation	Cost
		\$
	Total Supplies	\$

F. Consultants/Contracts.

Consultant Fees: For each consultant enter the name, if known, service to be provided, hourly or daily fee (8-hour day), and estimated time on the project. Include any pre-award grant writing services provided by a consultant in this section (maximum cost is \$1,500 per applicant)

Budget Narrative: Provide a narrative budget justification for each of the budget items identified.

Name of Consultant	Service Provided	Computation	Cost
			\$
	Sul	ototal – Consultant Fees	\$

Consultant Expenses: List all expenses to be paid from the grant to the individual consultant in addition to their fees (i.e., travel, meals, lodging, etc.).

Budget Narrative: Provide a narrative budget justification for each of the budget items identified.

Item	Location	Computation	Cost
			\$
	Subtotal	- Consultant Expenses	\$

Contracts: Provide a description of the product or services to be procured by contract and an estimate of the cost. Applicants are encouraged to promote free and open competition in awarding contracts. Any sole source contracts must follow the applicable requirements set forth in 2 C.F.R. §§ 200.317 through 200.326.

Budget Narrative: Provide a narrative budget justification for each of the budget items identified.

Item	Cost
	\$
Subtotal - Contracts	\$
Total Consultants/Contracts	\$

G. Other Costs. List items (e.g., reproduction, janitorial or security services, and investigative or confidential funds) by major type and the basis of the computation. For example, provide the square footage and the cost per square foot for rent, and provide a monthly rental cost and how many months to rent.

Budget Narrative: Provide a narrative budget justification for each of the budget items identified.

Important Note: If applicable to the project, construction costs should be included in this section of the Budget Detail Worksheet.

Description	Computation	Cost
		\$
		Total Other \$

H. Indirect Costs. Indirect costs are allowed only if the applicant has a federally approved indirect cost rate. A copy of the rate approval, (a fully executed, negotiated agreement), must be attached. If the applicant does not have an approved rate, one can be requested by contacting the applicant's cognizant Federal agency, which will review all documentation and approve a rate for the applicant organization, or if the applicant's accounting system permits, costs may be allocated in the direct costs categories.

Description	Computation	Cost
		\$
	Total Indirect Costs	\$

I. Budget Summary. When applicant has completed the budget worksheet, transfer the totals for each category to the spaces below. Compute the total direct costs and the total project costs. Indicate the amount of Federal funds requested and the amount of non-Federal funds that will support the project.

Budget Category	Federal Amount	Non-Federal Amount
A. Personnel	\$	\$
B. Fringe Benefits	\$	\$
C. Travel	\$	\$
D. Equipment	\$	\$
E. Supplies	\$	\$
F. Consultants/Contracts	\$	\$
G. Other	\$	\$
H. Indirect Costs	\$	\$

Total Requested Federal Amount	Total Non-Federal Amount	
\$	\$	
Combined Total Project Costs		
\$		

Vulnerability Assessment and Security Plan Certification Statement

Applicants must certify that they have had a vulnerability assessment completed and a security evaluation preparedness plan developed or updated within the last three years. Failure to submit this certification or modifying the language in this certification may result in an application not be considered for funding. Applicants are also required to submit their vulnerability assessments and security plans to DHS upon request.

I, [insert name], as [insert title] of [insert name of bus company], certify that a

vulnerability assessment has been completed and a security evaluation preparedness plan has been developed or updated for my company within the last three years.		
Signature	Date	

Appendix E – FY 2018 IBSGP Helpful Hints for Applicants

Are the following components included in the application package?

- SF-424, SF-424A, SF-424B, SF-424C (if applicable), SF-424D (if applicable), and SF-LLL
- IJ for proposed project only one IJ permitted
- Detailed budget containing only allowable costs
- Vulnerability Assessment/Security Plan Certification

Are the following items addressed within the Investment Justification narrative and detailed budget?

- Is the type of service provided easily identifiable in the application package (fixed-route, charter, or both)?
- For charter bus companies, are the number of UASI service areas identified?
- Does the budget contain at least the 50% required cost share?
- Does the IJ and the detailed budget only include allowable costs?
 - Are all of the expenses in the detailed budget addressed in the IJ narrative? (for example, a camera equipment budget line item should be addressed in narrative form in the IJ as it pertains to the overall security program)
 - Does the information in the detailed budget align with the budget summary in the LJ narrative?
- Does the IJ clearly explain how the projects fit into a funding priority area as identified in Appendix C FY 2018 Funding Guidelines?
- Does the IJ detail the value that this investment has in reducing the risk? Does it specify the current state of the company's security program, the gaps that must be filled to reduce risk, and how the project will fill that gap?
- Is the cost effectiveness of the project clearly explained in the IJ? How does this project provide a high security return on investment?
- If this investment is for a facility security enhancement, does it identify the exact location of the facility? In rural areas, include information sufficient for DHS/FEMA to locate applicant's facility with mapping software, such as GPS coordinates, nearby landmarks, nearest cross-streets, etc.
- Are timelines realistic and detailed?
- Does the M&A total no more than five percent (5%) of the total award?
- Do requested amounts in the IJ coincide with the amounts listed in the detailed budget and total budget amounts listed on the SF-424?
- Does the total application amount coincide with the SF-424 financial information submitted in <u>Grants.gov</u> and <u>ND Grants</u>?