

**The U.S. Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)
Fiscal Year 2018 Tribal Homeland Security Grant Program (THSGP)**

NOTE: If you are going to apply for this funding opportunity and have **not** obtained a Data Universal Numbering System (DUNS) number and/or **are not** 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

97.067

CFDA Title

Homeland Security Grant Program

Notice of Funding Opportunity Title

Tribal Homeland Security Grant Program

NOFO Number

DHS-18-GPD-067-00-02

Authorizing Authority for Program

Section 2005 of the *Homeland Security Act of 2002* (Pub. L. No. 107-296, as amended) (6 U.S.C. § 606)

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 Tribal Homeland Security Grant Program (THSGP) 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 THSGP 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 THSGP 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 Tribal Homeland Security Grant Program supports the goal of Readyng 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

THSGP provides funding directly to eligible tribes to support the building, sustainment, and delivery of core capabilities to enable Tribes to strengthen their capacity to prevent, protect against, mitigate, respond to, and recover from potential terrorist attacks.

Performance metrics for this program are as follows:

- Percentage of funding building new capabilities
- Percentage of funding sustaining existing capabilities

Priorities

DHS/FEMA publishes the annual National Preparedness Report to communicate progress in building, sustaining, and delivering the core capabilities outlined in the Goal. This analysis provides a National perspective on critical preparedness trends for whole community partners to use to inform program priorities, allocate resources, and communicate with stakeholders about issues of shared concern. The National Preparedness Report can be found at <http://www.fema.gov/national-preparedness-report>. The 2017 NPR identified the following subset of core capabilities as national areas for improvement:

- Cybersecurity;

- Infrastructure Systems;
- Economic Recovery;
- Housing;
- Supply Chain Integrity and Security;
- Natural and Cultural Resources; and
- Risk Management for Protection Programs and Activities.

In developing applications for the FY 2018 THSGP, recipients should consider funding projects that address core capability gaps within the NPR national areas for improvement to the extent that they relate to terrorism preparedness.

DHS/FEMA requires recipients to complete a Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR) and prioritize grant funding to support closing capability gaps or sustaining capabilities identified in this process.

For additional information on program priorities and objectives for the FY 2018 THSGP, refer to, Appendix A – FY 2018 THSGP Program Priorities

B. Federal Award Information

Award Amounts, Important Dates, and Extensions

Available Funding for the THSGP: **\$10,000,000**

Period of Performance: **Thirty-six (36) months**

Extensions to the period of performance are allowed. For additional information on period of performance extensions, refer to [Section H](#) of this NOFO, *Additional Information - Extensions*.

Projected Period of Performance Start Date(s): **September 1, 2018**

Projected Period of Performance End Date(s): **August 31, 2021**

Funding Instrument: **Grant**

C. Eligibility Information

Eligible Applicants

Directly eligible Tribes

Eligibility Criteria

In order to be eligible to receive THSGP funding, recipients must be directly eligible Tribes. Directly eligible Tribes are Federally recognized Tribes that meet the criteria set forth in Section 2001 of the *Homeland Security Act of 2002*, as amended (6 U.S.C. § 601).

Federally recognized Tribes are those Tribes appearing on the list published by the Secretary of the Interior pursuant to the *Federally Recognized Indian Tribe List Act of 1994* (Pub. L. No. 103-454) (25 U.S.C. § 479a-1).

Per 6 U.S.C. § 601(4), a “directly eligible Tribe” is any Federally recognized Indian Tribe that meets the following criteria:

- (A) Any Indian Tribe -
 - (i) that is located in the continental United States;
 - (ii) that operates a law enforcement or emergency response agency with the capacity to respond to calls for law enforcement or emergency services;
 - (iii)
 - a. that is located on or near (50 miles) an international border or a coastline bordering an ocean (including the Gulf of Mexico) or international waters;
 - b. that is located within 10 miles of a system or asset included on the prioritized critical infrastructure list established under section 210E(a)(2) [of the *Homeland Security Act of 2002*, as amended] or has such a system or asset within its territory;
 - c. that is located within or contiguous to one of the 50 most populous metropolitan statistical areas in the United States; or
 - d. the jurisdiction of which includes not less than 1,000 square miles of Indian country, as that term is defined in section 1151 of title 18, United States Code; and
 - (iv) that certifies to the Secretary [of Homeland Security] that a State has not provided funds under section 2003 [UASI] or 2004 [SHSP] of [the *Homeland Security Act of 2002*, as amended] to the Indian Tribe or consortium of Indian Tribes for the purpose for which direct funding is sought; and
- (B) A consortium of Indian Tribes, if each Tribe satisfies the requirements of subparagraph (A).

In summary, directly eligible Tribes must meet the requirements set forth in (A)(i), (A)(ii), and (A)(iv). Tribes must also meet one of the requirements set forth in (A)(iii): either (A)(iii)(a), (A)(iii)(b), (A)(iii)(c), or (A)(iii)(d). Finally, under subparagraph (B), a consortium may also be eligible to be a recipient if each Indian Tribe in the consortium meets the criteria for a directly eligible Tribe under subparagraph (A).

In FY 2018, applicants must self-certify as to whether they meet the eligibility requirements. Self-certification will be provided on the THSGP Eligibility Certification Form as part of the application Investment Justification (IJ). Additionally, DHS/FEMA will verify grant recipient eligibility against this criteria. Any questions regarding an applicant’s proximity to a Critical Infrastructure (CI) site, as described in the eligibility criteria, may be directed to the State Administrative Agency (SAA) for the state with which the Tribal Nation shares a border. The State Administrative Contacts List can be found at <http://www.fema.gov/media-library/assets/documents/28689?id=6363>.

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 Implementation Objectives (<https://www.fema.gov/implementation-guidance-and-reporting>).

Emergency incident management and incident response activities require carefully managed resources (personnel, teams, facilities, equipment and/or supplies) to meet incident needs. Utilization of the standardized resource management concepts such as typing, credentialing, and inventorying promote a strong national mutual aid capability needed to support 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 is available under <http://www.fema.gov/resource-management-mutual-aid>.

FEMA developed the NIMS Guideline for Credentialing of Personnel to describe national credentialing standards and to provide written guidance regarding the use of those standards. This guideline describes credentialing and typing processes, and identifies tools which Federal Emergency Response Officials (FEROs) and emergency managers at all levels of government may use both routinely and to facilitate multijurisdictional coordinated responses.

Although state, local, tribal, territorial and private sector partners—including nongovernmental organizations—are not required to credential their personnel in accordance with these guidelines, FEMA strongly encourages them to do so in order to leverage Federal investment in the Federal Information Processing Standards (FIPS) 201 infrastructure and to facilitate interoperability for personnel deployed outside their home jurisdiction. Additional information is available from the <http://www.fema.gov/nims-doctrine-supporting-guides-tools>.

Cost Share or Match

Cost share or cost match is not required under this program.

D. Application and Submission Information

Key Dates and Times

Date Posted to Grants.gov:	May 21, 2018
Application Submission Deadline:	June 20, 2018 at 5:00 p.m. 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 Headquarters (HQ) Program Analyst as soon as possible before 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 [Grants.gov](https://www.grants.gov) (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 [Grants.gov](https://www.grants.gov) portal. Final applications are completed and submitted through FEMA's Non-Disaster Grants ([ND Grants](#)) 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](https://www.grants.gov);
4. Submitting an initial application in [Grants.gov](https://www.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. 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 [Grants.gov](https://www.grants.gov) and to submit final applications through [ND Grants](https://www.nd.gov/nd-grants).

How to Register to Apply through [Grants.gov](https://www.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](https://www.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 [Grants.gov](https://www.grants.gov) to download the appropriate version of the software at: <https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html>

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/applicants/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 [Grants.gov](#) 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 [Grants.gov](#), eligible applicants will be notified by DHS/FEMA and asked to proceed with submitting their complete application package in [ND Grants](#). 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 [ND Grants](#) 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:

- THSGP Investment Justification (OMB Control Number: 1660-0113/FEMA Form: 089-22) (see [Appendix C – FY 2018 THSGP Investment Justification \(IJ\) Outline](#) for a description of the IJ and the IJ submission process);
- Self-certification form stating the Tribe's eligibility per the *Homeland Security Act of 2002*, as amended (the self-certification is contained within the THSGP Investment Justification);
- Standard Form 424D, Standard Assurances (Construction) if applying for funds to use for construction;
- Standard Form 424 C Budget Information (Construction) if applying for funds to use for construction; and
- Indirect Cost Agreement, if applicable.

For assistance registering for the ND Grants system, please contact ndgrants@fema.gov or (800) 865-4076.

Timely Receipt Requirements and Proof of Timely Submission

All applications must be received in [ND Grants](#) by **5:00 PM Eastern Time on June 20, 2018**. Proof of timely submission is automatically recorded by [ND Grants](#). 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 [Grants.gov](#) and [ND Grants](#) receive your application. Again, [Grants.gov](#) 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 [Grants.gov](#) 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 [ND Grants](#) system should contact ndgrants@fema.gov or (800) 865-4076.

Intergovernmental Review

An intergovernmental review may be required. Applicants must contact their state's Single Point of Contact (SPOC) to comply with the state's process under Executive Order 12372 (See <http://www.fws.gov/policy/library/rgeo12372.pdf>).

Funding Restrictions

Federal funds made available through this award may be used only 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.

For additional information on allowable costs and Funding Restrictions, refer to

Appendix B – FY 2018 THSGP Funding **Guidelines.**

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 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 and approved 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 [here](#) and further EHP guidance can be found at <https://www.fema.gov/media-library/assets/documents/85376>.

Emergency Communications and Resilience

All entities using THSGP funding to support emergency communications investments are required to comply with the [SAFECOM Guidance on Emergency Communications Grants \(SAFECOM Guidance\)](#). 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 [National Emergency Communications Plan \(NECP\)](#). 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.

FirstNet

The Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, as amended (codified in part at 47 U.S.C. §§ 1401-1473) established the First Responder Network Authority (hereinafter FirstNet Authority) as an independent authority within the National Telecommunications and Information Administration (“NTIA”).¹ The FirstNet Authority’s statutory mission to establish a nationwide public safety broadband network (FirstNet).² FirstNet uses the 700 MHz D block spectrum to provide Long-Term Evolution (LTE)-based broadband services and applications to public safety entities.³ FirstNet became operational in March 2018

¹ 47 U.S.C. § 1424(a).

² 47 U.S.C. § 1426(b).

³ 47 U.S.C. §§ 1401(2), 1421(a).

and is based on a single, national network architecture that will evolve with technological advances and initially consist of a core network and radio access network (RAN).

FirstNet will provide public safety entities with mission critical broadband data capabilities and services including, but not limited to messaging, image sharing, video streaming, group text, voice, data storage, application, location-based services, and Quality of Service, Priority and Preemption. Public safety entities seeking to enhance their operational capabilities using broadband technology may seek grant funding to support the following:

- **Planning for integration** of information technology (IT) infrastructure, software, and site upgrades necessary to connect to FirstNet.
- **Handheld broadband devices** including smartphones, feature phones, tablets, wearables, push-to-talk (PTT) devices.
- **Vehicle-mounted or otherwise field operated data devices** such as ruggedized laptops.
- **Network access devices** including portable Wi-Fi devices, Universal Serial Bus (USB) modems/dongles, trunk-mounted modems, routers.
- **Customer Owned and Managed (COAM) broadband deployable equipment**, enabling public safety to own and dispatch coverage expansion or capacity enhancement equipment within their jurisdiction.
- **Broadband device accessories** that enable efficient and safe public safety operations such as headsets, belt clips, ear pieces, remote Bluetooth sensors, ruggedized cases.
- **Subscriber Identification Modules (SIMs)/Universal Integrated Circuit Cards (UICCs)** to allow public safety users to update existing devices to operate on public safety prioritized services.
- **One-time purchase and subscription-based applications** for public safety use which could include, among a number of other options, enterprise mobility management (EMM), mobile device management (MDM), mobile Virtual Private Network (VPN), identify services, or cloud service tools.

As FirstNet is built out in all 56 states and territories and coverage and capacity for first responders expands, recipients are strongly encouraged to coordinate with the Statewide Interoperability Coordinator (SWIC) and FirstNet on (1) the planning, deployment timelines, and operational availability of the network deployment within a specific state or territory; (2) to ensure the project does not conflict with network planning efforts; and (3) that the project complies with all technical requirements. FirstNet requires participating agencies to demonstrate a subscription to public safety-prioritized broadband services to purchase FirstNet broadband devices or applications. **Information Bulletin #386 is hereby rescinded as the technical requirements and nationwide network architecture has been developed, and FirstNet is operational.** Recipients, however, must coordinate with FirstNet in advance of any strategic acquisition of broadband LTE equipment to ensure that purchases adhere to all applicable standards for public safety entities. Recipients with questions on FirstNet should contact info@firstnet.gov. Please refer to the [SAFECOM Guidance](#) for additional guidance.

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.

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.

Direct Costs

Planning

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

Organization

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

Equipment

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

Training

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

Exercise

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

Personnel Activities

Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable THSGP planning, training, exercise, and equipment activities. See

[Appendix B – FY 2018 THSGP Funding](#) **Guidelines** for additional details.

Travel

Domestic travel costs are allowed under this program, as provided for in this NOFO. International travel is not an allowable cost under this program unless approved in advance by DHS/FEMA.

Construction and Renovation

Construction and renovation costs to achieve capability targets related to preventing, preparing for, protecting against, or responding to acts of terrorism are allowed under this program. For construction costs to be allowed, they must be specifically approved by DHS/FEMA in writing prior to the use of any program funds for construction or renovation. See

[Appendix B – FY 2018 THSGP Funding Guidelines](#) for additional details. Additionally, recipients are required to submit a SF-424C Form and Budget detail citing the project costs.

Operational Overtime

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

Maintenance and Sustainment

Maintenance and Sustainment related costs are allowed under this program only as described in this NOFO.

Critical Emergency Supplies

Critical emergency supply related costs are allowed under this program only as described in this NOFO.

Secure Identification

Secure Identification project related costs are allowed under this program only as described in this NOFO.

Management and Administration (M&A)

Management and administration costs are allowed. Recipients may use up to five percent (5%) of the amount of the award for M&A. Where applicable, subrecipients may use up to five percent (5%) of the amount they receive for M&A. M&A activities are those defined as directly relating to the management and administration of THSGP funds, such as financial management and monitoring. Management and administrative expenses must be based on actual expenses or known contractual costs. M&A 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, 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.

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 discuss 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 Writers

Grant writing contractors may 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](https://www.grants.gov) and ND Grants. Grant writers may assist in a variety of ways up to and including the actual submission of the application. Ultimately the applicant that receives an award is solely responsible for all grant award and administrative responsibilities.

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 DHS/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 Inspector General.

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, grant 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, DHS/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 section in each 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, if applicable; a copy of the grant writer's contract agreement; a copy of the invoice or purchase order; and a copy of the cancelled check or proof of payment. These records must be made available to DHS/FEMA upon request.

Indirect (Facilities & 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.

E. Application Review Information

Application Evaluation Criteria

FY 2018 THSGP applications will be evaluated through a three part review and selection process:

1. Applications will first be reviewed by a FEMA HQ Program Analyst to ensure the applicant meets all eligibility requirements. To determine eligibility, the FEMA HQ Program Analyst will review submitted applications for completeness.

Completeness is determined by the FEMA HQ Program Analyst by confirming:

- The applicant has submitted the self-certification form stating the Tribe's eligibility per the *Homeland Security Act of 2002*, as amended (see Section C. Eligibility Criteria, for further information);
 - The information provided in the self-certification form is accurate;
 - Activities under each investment are allowable; and
 - The application meets all of the administrative criteria identified in this NOFO, to include the required submission of an IJ by the established due dates.
2. Eligible and complete applications will then be reviewed through a review process, in which proposed investments will be individually scored. Scoring is based on the following four criteria (see [Appendix C – FY 2018 THSGP Investment Justification Outline](#) for more details):
 - Overview (description of the investment);
 - Baseline (goals/objectives/capabilities of the investment);

- Project management and milestones (funding amount/core capabilities/projects); and
 - Accomplishments and impacts (outcomes).
3. FEMA HQ Grants Management Specialists will conduct a financial risk assessment of the top scoring investments using the following criteria:
- Allowability, allocability, and financial reasonableness of the proposed budget and investment information; and
 - Whether the recipient meets the financial and legal requirements listed in 2 C.F.R. Part 200.

Prior to making a Federal award, FEMA is required by 31 U.S.C. § 3321 note, 41 U.S.C. § 2313, and 2 C.F.R. § 200.205 to review information available through any OMB-designated repositories of government-wide eligibility qualification or financial integrity information. Therefore application evaluation criteria may include the following risk based considerations of 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.

Supplemental Financial Integrity Review

Prior to making a Federal award where the Federal share is expected to exceed the simplified acquisition threshold, currently \$150,000, DHS/FEMA is required to review and consider any information about the applicant in the [Federal Awardee Performance and Integrity Information System \(FAPIIS\)](#), which is also accessible through the [SAM](#) website.

- 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

A panel of reviewers will analyze and score the investments from all applications that the Program Analysts determine to be complete and eligible. DHS/FEMA will assign reviewers who meet one or more of the following criteria:

- Experience working with tribes and tribal professionals;
- Federal employees experienced in a variety of disciplines, including homeland security, emergency management, law enforcement, fire and rescue, etc.; and/or
- Familiar with applications for funding and the application review process.

The reviewers will analyze and score the anticipated effectiveness of each individual proposed investment. Effectiveness is determined based on completeness and adherence to programmatic guidelines.

Reviewers will score each investment individually using six questions to assess how well the investments satisfy the four criteria sections in the Investment Justification template: Overview, Baseline, Project Management and Milestones, and Accomplishments and Impact.

The questions the reviewers will score are:

- A. Overview Section of Investment
 - How well are the activities described, including any activities that include planning, organization, equipment, training, and/or exercises?
- B. Baseline Section of Investment
 - How well does this identify existing capability levels and address capability gaps?
- C. Project Management and Milestones Section of Investment
 - How well does the activity support the selected core capabilities outlined in the Goal?
 - Does the budget narrative provide a clear explanation of how funds demonstrate the need to achieve the outcomes described?
 - Do the projects/activities demonstrate progress towards achieving the Investment?
- D. Accomplishments and Impact Section of Investment
 - Do the outcome(s) demonstrate progress towards building the capability gap(s) identified in the Investment?

Each of the six questions that the reviewers score is worth a maximum of five (5) points. Using their subject matter expertise, the reviewers will provide a score of 1-5 for each question. Each investment will be reviewed by no less than two reviewers, who will use the following scoring scale to assess how well the information provided in each investment answers the question being scored:

- 1 = Little to None
- 2 = Inadequate
- 3 = Adequate
- 4 = Substantial
- 5 = Strong

To calculate the final score for each proposed investment, the scores from the six investment questions are first normalized by taking the average of the six (6) scores, dividing this number by five (5), and multiplying by 100. For example, if an investment received the following scores for the six questions:

- Question 1: 2
- Question 2: 3
- Question 3: 5
- Question 4: 5
- Question 5: 3
- Question 6: 5

The sum of the scores is 23 (the average score is 3.8). The average score, 3.8 is then divided by five (5) with the result multiplied by 100. The normalized score is 76.67. The investment's final score is determined by averaging the normalized scores from all reviewers of that investment.

Applicants who have not received funding in prior years will receive five (5) points that will be added to the normalized score for each investment submitted.

All final investment scores will be sorted in descending order and investments will be selected for recommendation from the highest score to lowest score until available FY 2018 THSGP funding has been exhausted. In the event of a tie during the investment recommendation determination process, DHS/FEMA will give priority to the tribal entity that has not received prior year funding.

All investments selected for recommendation will also undergo an additional risk review conducted by the FEMA HQ Grants Management Specialist to evaluate the risk for noncompliance in carrying out the Federal award. Using their subject matter expertise, the questions the FEMA HQ Grants Management Specialist will assess are:

- Is the applicant on any exclusion lists as identified in the System for Award Management (Sam.gov)?
- If the applicant has received Federal funding in the past, has the applicant performed all audits required by the Single Audit requirements under 2 C.F.R. Part 200, Subpart F?
- Has the applicant provided sufficient budget information and justification as required by the NOFO?
- Are the costs proposed by the applicant in the budget information and justification allowable and reasonable based on the criteria set forth in this NOFO and the Cost Principles located at 2 C.F.R. Part 200, Subpart E?
- Is the budget representative of the total cost of performance of the projects?
- If indirect costs are included, has the applicant provided an approved Indirect Cost Rate agreement?
- Is the applicant delinquent on any Federal debt?
- Has the applicant had substandard performance in a prior award?

Based on the outcome of this review, DHS/FEMA may determine that it will not make an award to an applicant that poses a risk of noncompliance. DHS/FEMA may also determine that it will make an award to an at-risk applicant, subject to additional terms and conditions as described in 2 C.F.R. § 200.207.

DHS/FEMA will use the results of the review process to make funding recommendations to the Secretary of the Department of Homeland Security. Final funding determinations will be made by the Secretary of the Department of Homeland Security.

F. Federal Award Administration Information

Notice of Award

Notification of award approval is made through the ND Grants system through an automatic electronic mail to the awardee authorized official listed in the initial application. The “award date” for THSGP will be the date that DHS/FEMA approves the award. The awardee should follow the directions in the notification to confirm acceptance of the award.

Funds will remain on hold until the recipient accepts the award through the ND Grants system 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 the awarding agency of its intent to accept and proceed with work under the award through the ND Grants system. 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 grant and cooperative agreements are required to comply with [DHS Standard Administrative 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 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

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

Federal Financial Reporting Requirements

Federal Financial Report (FFR)

Grant 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 Systems \(PARS\)](#). A FFR 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.

The Federal Financial Reporting Form (FFR) is available online at: <https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html>, SF-425 OMB #4040-0014.

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, recipients 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 Government Accountability Office's (GAO) 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 will be required to report on progress towards implementing projects described in their application on a biannual basis.

Program 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

Additional Programmatic Reporting Requirements and Information

Biannual Strategy Implementation Reports (BSIR)

In addition to the quarterly financial and biannual performance progress reports, recipients are responsible for completing and submitting summer and winter BSIRs. The BSIR is due within 30 days after the end of the reporting period (July 30 for the reporting period of January 1 through June 30 (the summer BSIR report); and January 30 for the reporting period of July 1 through December 31 (winter BSIR report).

In each THSGP recipient's BSIR, as part of programmatic monitoring, recipients will be required to describe how expenditures support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process. THSGP recipients will, on a project-by-project basis, check one of the following:

- Building a capability with THSGP funding; or
- Sustaining a capability with THSGP funding.

Threat and Hazard Identification and Risk Assessment (THIRA)

FY 2018 THSGP award recipients must complete the THIRA, following the new methodology released by FEMA in 2018, but only for eight core capabilities. Those core capabilities are as follows: 1) Infrastructure Systems, 2) Mass Care Services, 3) Mass Search and Rescue Operations, 4) On-Scene Security, Protection, and Law Enforcement, 5) Operational Communications, 6) Operational Coordination, 7) Planning, and 8) Public Information and Warning. Recipients must use the Unified Reporting Tool (URT) to submit the THIRA to FEMA by December 31, 2018. In 2019, FY 2018 THSGP recipients may be required to complete the THIRA for additional core capabilities. Recipients have the option of completing the THIRA process, or portions of the THIRA process, for the other core capabilities, but are not required to do so in 2018.

FY 2017 THSGP recipients receiving awards in FY 2018 must also complete the new methodology for the FY 2018 award.

For additional guidance on THIRA, please refer to Comprehensive Preparedness Guide (CPG) 201, Third Edition, available at <http://www.fema.gov/threat-and-hazard-identification-and-risk-assessment>. Further details on the THIRA as it relates to THSGP Program requirements can be found in [Appendix A – FY 2018 THSGP Program Priorities](#).

Stakeholder Preparedness Review (SPR)

The SPR is an annual capability assessment that helps communities to identify capability gaps and prioritize investments required to reach the targets set in their THIRA.

FY 2018 THSGP award recipients must complete the SPR, following the new methodology released by FEMA in 2018, but only for eight core capabilities. Those core capabilities are as follows: 1) Infrastructure Systems, 2) Mass Care Services, 3) Mass Search and Rescue Operations, 4) On-Scene Security, Protection, and Law Enforcement, 5) Operational Communications, 6) Operational Coordination, 7) Planning, and 8) Public Information and Warning. Recipients must use the URT to submit the SPR to FEMA by December 31, 2018. In 2019, FY 2018 THSGP recipient may be required to complete the SPR for additional core capabilities.

Recipients have the option of completing the SPR process, or portions of the SPR process, for the other core capabilities, but are not required to do so in 2018. However, if recipients have capability gaps in areas related to the eight core capabilities above that are not addressed by the THIRA target, or in areas related to the other 11 Response and Recovery core capabilities, they must use the SPR Planning Organization Equipment Training and Exercise (POETE) checkboxes to identify those capability gaps.

For additional guidance on SPR, please refer to CPG 201, Third Edition, available at <http://www.fema.gov/threat-and-hazard-identification-and-risk-assessment>. Further details on the SPR as it relates to THSGP Program requirements can be found in Appendix A – FY 2018 THSGP Funding Priorities.

Emergency Operations Plan (EOP)

Recipients are required to complete one submission of their EOP for the entire period of performance of the grant in order to comply with [CPG 101 Version 2.0 \(v2\)](#), *Developing and Maintaining Emergency Operations Plans*. Recipients will use the URT to report their compliance with this reporting requirement.

Supplemental Information Reporting Systems

In addition to ND Grants, the following information systems are used for the submission of required reports:

Grant Reporting Tool (GRT)

The GRT is the system in which THSGP recipients will submit their BSIR information. THSGP recipients are responsible for filing a semi-annual BSIR report in the GRT and should register to create an account as soon as possible. Recipients should go to the following link and follow the links to create a new account: <https://www.reporting.odp.dhs.gov/>. This report is used to track the progress toward the completion of projects.

Unified Reporting Tool (URT)

The URT is DHS/FEMA's collection mechanism for THIRA, SPR, and related preparedness information. The URT includes questions related to NIMS adoption and implementation, CPG 101 v2 compliance, and other preparedness questions, as appropriate. Information on the URT, including when recipients will receive the tool and how to use the tool, will be sent to recipients later in 2018.

Closeout Reporting Requirements

DHS/FEMA will close out the grant award when it determines that all applicable administrative actions and all required work of the THSGP 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 expiration of an approved extension via Grant Adjustment Notice (GAN) issued to close out the grant.

Within 90 days of the end of the period of performance, or after expiration of a close out extension via GAN, 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 all the following documentation:

- 1) Final request for payment, if applicable;
- 2) SF-425 – Final Federal Financial Report;
- 3) Final Performance Progress Report;
- 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 in a Word document; and

5) Other documents required by program guidance or terms and conditions of the award.

Additionally, the recipient must liquidate all obligations incurred under the THSGP award no later than 90 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 its 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 THSGP grant 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 impacted or restricted.

If the recipient that issues subawards, it is responsible for closing out those subawards as described in 2 C.F.R. § 200.343. The recipient must ensure that it completes the closeout of its subawards in time to submit all necessary documentation and information to DHS/FEMA during the closeout of its own grant award.

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 askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

GPD 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 ASK-GMD@fema.gov.

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 at <https://www.fema.gov/fema-regional-contacts>.

GPD Environmental Planning and Historic Preservation (GPD EHP)

The 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. EHP Technical Assistance, including the EHP Screening Form, can be found online at: <https://www.fema.gov/media-library/assets/documents/90195>.

Systems Information

Grants.gov

For technical assistance with [Grants.gov](https://www.grants.gov), please call the [Grants.gov](https://www.grants.gov) 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

DHS/FEMA uses the [Payment and Reporting System \(PARS\)](#) 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, recipients must complete a Standard Form 1199A, Direct Deposit Form.

H. Additional Information

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 and 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 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 entities other than states under 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
- Cancelled 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 cancelled 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.

Conflicts of Interest in the Administration of Federal Awards or 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 and pass-through entities must follow their own policies and procedures regarding the elimination or reduction of conflicts of interest when making subawards. Recipients and pass-through entities 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 or pass-through entity 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 that may arise during the administration of the Federal award. Recipients and pass-through entities must disclose any real or potential conflicts to the FEMA HQ Program Analyst within five (5) days of learning of the conflict of interest. Similarly, subrecipients must disclose any real or potential conflict of interest to the pass-through entity as required by the Recipient's conflict of interest policies, or any applicable state, local, or tribal statutes or regulations.

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 period of performance for this program are allowed. Extensions to the initial period of performance identified in the award will only be considered through formal, written requests to the recipient's respective FEMA HQ Program Analyst and must contain specific and compelling justifications as to why an extension is required. Tribes 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 the existing Period of Performance;
- 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 are typically granted for no more than a six month time period.

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 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 at: <https://www.dhs.gov/cveas-portal#>.

Tribes are encouraged to review the referenced active shooter guidance, evaluate their preparedness needs, and consider applying for THSGP funding to address any needs identified in this area (see [Appendix C – FY 2018 THSGP Funding Guidelines](#) for allowable costs). To address training needs associated with active shooter incidents, FEMA’s Emergency Management Institute provides a free, web-based training course entitled *IS-907: Active Shooter: What You Can Do*, available at the following website: <https://training.fema.gov/is/courseoverview.aspx?code=IS-907>.

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 [Hometown Security Program](#).

Expanded Allowable Costs for General Purpose Equipment

THSGP allows expenditures on general purpose equipment if they align to and support one or more core capabilities identified in the Goal; are sharable through the Emergency Management

Assistance Compact (EMAC),⁴ like with all equipment funded under THSGP; and are allowable under 6 U.S.C. § 609, and any other applicable provision of the *Homeland Security Act of 2002*, as amended. Further, as with all THSGP investments, there must be a clear nexus to terrorism preparedness. Examples of such general purpose equipment may include:

- Law enforcement vehicles;
- Emergency medical services (EMS) equipment and vehicles;
- Fire service equipment and vehicles, to include hose, pump accessories, and foam concentrate for specialized chemical, biological, radiological, nuclear, and explosives (CBRNE) response; and
- Office equipment for staff⁵ engaged in homeland security program activity.

Equipment allowability is based on the [Authorized Equipment List \(AEL\)](#) *but exceptions may be considered on a case-by-case basis if* (1) the equipment identified to be purchased directly maps to a core capability contained within the Goal,⁶ and (2) the equipment's purpose (when operational) fall into the permitted use of funds in accordance with 6 U.S.C. § 609, and any other applicable provision of the *Homeland Security Act of 2002*, as amended.

⁴ Except for American Samoa and the Commonwealth of the Northern Mariana Islands which are not required to belong to EMAC at this time.

⁵ This applies to all homeland security personnel, and is not limited to management and administration staff, and costs are to be captured outside the cap on management and administration costs.

⁶ <https://www.fema.gov/media-library/assets/documents/25959>.

Appendix A – FY 2018 THSGP Program Priorities

Alignment of THSGP to the National Preparedness System

The FY 2018 THSGP plays an important role in the implementation of the Goal by supporting the building, sustainment, and delivery of the core capabilities. The core capabilities are essential for the execution of critical tasks for each of the five mission areas outlined in the Goal. Delivering core capabilities requires the combined effort of the whole community, rather than the exclusive effort of any single organization or level of government. The THSGP allowable costs support efforts to build and sustain core capabilities across the prevention, protection, mitigation, response, and recovery mission areas described in the Goal.

Particular emphasis in THSGP will be placed on capabilities that address the greatest risks to the security and resilience of tribal communities and the United States. Funding will support deployable assets that can be utilized through automatic assistance and mutual aid agreements.

The FY 2018 THSGP Program supports investments that improve the ability of jurisdictions nationwide to:

- Prevent a threatened or an actual act of terrorism;
- Protect our citizens, residents, visitors, and assets against the greatest threats and hazards;
- Mitigate the loss of life and property by lessening the impact of future disasters.
- Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of a catastrophic incident; 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, innovation, and appropriate administrative, finance, and logistics systems.

To support building, sustaining, and delivering these core capabilities, recipients will use the components of the National Preparedness System, which include: Identifying and Assessing Risk; Estimating Capability Requirements; Building and Sustaining Capabilities; Planning to Deliver Capabilities; Validating Capabilities; and Reviewing and Updating.

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

DHS/FEMA requires recipients to prioritize grant funding to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process. Recipients are also expected to consider national areas for improvement identified in the 2017 National Preparedness Report as they relate to terrorism preparedness. They include cybersecurity; economic recovery; housing; infrastructure systems; natural and cultural

resources; and supply chain integrity and security. Addressing these areas for improvement will enhance preparedness nation-wide. Minimum funding amounts are not prescribed by the Department for these priorities; however, recipients are expected to support state, local, regional, and national efforts in achieving the desired outcomes of these priorities.

Reporting on the Implementation of the National Preparedness System

Federal investments in local, State, territorial, and tribal preparedness capabilities have contributed to the development of a significant national-level capacity to prevent, protect against, mitigate, respond to, and recover from emergencies and catastrophic incidents. THSGP prescribes national capability priorities in order to prioritize and invest in key capabilities.

Knowledge of risks enables a community to make informed decisions about how to manage risk and develop needed capabilities. Risk is the potential for an unwanted outcome resulting from an incident, event, or occurrence, as determined by its likelihood and the associated consequences. By considering changes to these elements, a community can understand how to best manage and plan for its greatest risks across the full range of the threats and hazards it faces.

The THIRA/SPR process helps communities identify capability targets and resource requirements necessary to address anticipated and unanticipated risks. THSGP award recipients will be required to complete the THIRA/SPR process for a subset of the core capabilities. They may also optionally add additional targets; more information on this requirement will be forthcoming. CPG 201, Third Edition, a guide on how to complete a THIRA, is available at <http://www.fema.gov/threat-and-hazard-identification-and-risk-assessment>.

Reporting Requirements

FY 2018 THSGP award recipients must complete the THIRA and SPR, following the new methodology released by FEMA in 2018, but only for eight core capabilities. Those core capabilities are as follows: 1) Infrastructure Systems, 2) Mass Care Services, 3) Mass Search and Rescue Operations, 4) On-Scene Security, Protection, and Law Enforcement, 5) Operational Communications, 6) Operational Coordination, 7) Planning, and 8) Public Information and Warning. Recipients must use the URT to submit the THIRA and SPR to FEMA by December 31, 2018. Recipients have the option of completing the THIRA and SPR processes, or portions of them, for the other core capabilities but are not required to do so. However, if recipients are proposing grant investments in the other 11 Response and Recovery core capabilities, or in area of the eight capabilities listed above that were not addressed by their THIRA targets, they must use the SPR to identify any gaps related to these other capabilities and areas. FEMA will provide additional guidance on 2019 requirements at a later date.

FY 2018 THSGP recipients may have to update their THIRAs in 2019 should FEMA add any prevention, protection, or mitigation core capabilities to the list of eight required core capabilities above. Also beginning in 2019, jurisdictions will be required to submit a THIRA every three (3) years to establish a consistent baseline for assessment.

In each THSGP recipient's BSIR, as part of programmatic monitoring, recipients will be required to describe how expenditures support closing capability gaps or sustaining

capabilities identified in the THIRA/SPR process. THSGP recipients will, on a project-by-project basis, check one of the following:

- Building a capability with THSGP funding; or
- Sustaining a capability with THSGP funding.

National Incident Management System (NIMS) Implementation

Recipients receiving THSGP funding are required to implement the National Incident Management System (NIMS). NIMS defines a national, interoperable approach for sharing resources, coordinating and managing incidents, and communicating information. Incident management refers to how incidents are managed across all homeland security activities, including prevention, protection, and response, mitigation, and recovery. FY 2018 THSGP recipients must utilize standardized resource management concepts such as typing, credentialing, and inventorying resources that facilitates the effective identification, dispatch, deployment, tracking and recovery of their resources.

Reporting Requirements

Recipients will use the URT to report NIMS implementation.

Planning to Deliver Capabilities

Recipients shall develop and maintain a jurisdiction-wide, all threats and hazards Emergency Operations Plan (EOPs) consistent with CPG 101 v2. Recipients must submit an EOP once during the period of performance.

Reporting Requirements

Recipients report EOP compliance with CPG 101 v2 in the URT.

Validating Capabilities

Recipients should engage elected and appointed officials and other whole community stakeholders to identify long-term training and exercise priorities. These priorities should address capability targets and gaps identified through the annual THIRA and SPR processes, areas for improvement identified from real-world events and exercises, and national areas for improvement identified in the most recent National Preparedness Report.

Recipients should document these priorities and use them to develop a schedule of exercise events and supporting training activities in a Multi-year Training and Exercise Plan (TEP). Information related to Multi-year TEPs and Training and Exercise Planning Workshops (TEPWs) can be found on the Homeland Security Exercise and Evaluation Program (HSEEP) website at <https://www.fema.gov/exercise>.

All recipients will develop and maintain a progressive exercise program consistent with HSEEP and support of the National Exercise Program (NEP). The NEP serves as the principal exercise mechanism for examining national preparedness and measuring readiness. Recipients are strongly encouraged to nominate exercises into the NEP. For additional information on the NEP, please refer to (<http://www.fema.gov/national-exercise-program>)

Reporting Requirements

- Recipients are required to develop a Multi-year TEP that identifies training and exercise priorities and activities. The TEP shall be submitted to HSEEP@fema.dhs.gov no less than 90 days after the completion of the TEPW. Recipients are encouraged to enter their exercise information in the Preparedness Toolkit at <https://preptoolkit.fema.gov/web/hseep-resources/home>. DHS/FEMA will release additional guidance on Preparedness Toolkit, including how enter exercise data, later in 2018.
- Recipients shall submit their After-Action Report/Improvement Plan (AAR/IPs) to the HSEEP inbox (HSEEP@fema.dhs.gov) and indicate the applicable THSGP grant year which the submission is intended to fulfill. If the recipient submits a single AAR/IP to cover a THSGP progressive exercise series, the recipient must then specify the applicable THSGP 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. 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 AAR/IP in the Preparedness Toolkit at <https://preptoolkit.fema.gov/web/hseep-resources/home>. DHS/FEMA will release additional guidance on Preparedness Toolkit, including how develop and enter an AAR/IP, later in 2018.

Additional Requirements and Considerations

Strengthening Governance Integration

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

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

- *Coordination of Investments* – resources must be allocated to address the most critical capability needs.
- *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/FEMA grants support must include local government representatives. At the State, Tribal, and regional levels, local risk assessments must be included in the overarching analysis to ensure that the threats and hazards of most concern to the jurisdiction are accounted for.

- *Accountability* – FEMA recognizes that unique preparedness gaps exist at the local level. However, grant recipients are responsible for ensuring the effective use of grant funds to address gaps and for maintaining and sustaining existing capabilities.
- *Support of Regional Coordination* – Inter/intra-state partnerships and dependencies at the state, Tribal, and regional level, including those within metropolitan areas, must be recognized.

Ensuring the Protection of Civil Rights

As the Nation works towards achieving the Goal, it is important to continue to protect the civil rights of individuals. Recipients must carry out their programs and activities, including those related to the building, sustainment, and delivery of core capabilities, in a manner that respects and ensures the protection of civil rights for protected populations. These populations include but are not limited to individuals with disabilities and others with access and functional needs, individuals with limited English proficiency, and other diverse racial and ethnic populations in accordance with Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and related statutes. The [DHS Standard Terms and Conditions](#) include the provisions that apply to all recipients. Additional information on civil rights provisions is available at <http://www.fema.gov/office-equal-rights>.

Improving Cybersecurity Capabilities

When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity](#) (“The Framework”) developed by the National Institute of Standards and Technology (NIST). The Framework gathers existing international standards and practices to help organizations understand, communicate, and manage their cyber risks. For organizations that do not know where to start with developing a cybersecurity program, the Framework provides initial guidance. For organizations with more advanced practices, the Framework offers a way to improve their programs, such as better communication with their leadership and suppliers about management of cyber risks.

The Department of Homeland Security's Critical Infrastructure Cyber Community C³ Voluntary Program also provides resources to critical infrastructure owners and operators to assist in adoption of the Framework and managing cyber risks. Additional information on the Critical Infrastructure Cyber Community C³ Voluntary Program can be found at www.dhs.gov/ccubedvp.

The Department of Homeland Security’s Enhanced Cybersecurity Services (ECS) program is an example of a resource that assists in protecting U.S.-based public and private entities and combines key elements of capabilities under the “Detect” and “Protect” functions to deliver an impactful solution relative to the outcomes of the Cybersecurity Framework. Specifically, ECS offers intrusion prevention and analysis services that help U.S.-based companies and state, local, tribal, and territorial governments defend their computer systems against unauthorized access, exploitation, and data exfiltration. ECS works by sourcing timely, actionable cyber threat indicators from sensitive and classified Government Furnished Information (GFI). DHS then shares those indicators with accredited Commercial Service Providers (CSPs). Those CSPs in turn use the indicators to block certain types of malicious

traffic from entering a company's networks. Groups interested in subscribing to ECS must contract directly with a CSP in order to receive services. Please visit <http://www.dhs.gov/enhanced-cybersecurity-services> for a current list of ECS CSP points of contact.

Appendix B – FY 2018 THSGP Funding Guidelines

Recipients must comply with all applicable requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards located at 2 C.F.R. Part 200.

In administering the THSGP grant award, the Tribe must comply with the following general requirements:

1. THSGP Priorities

THSGP aligns to all mission areas outlined in the Goal. Applicants must align proposed funding to at least one or more Goal core capabilities within the IJ Template.

2. Management and Administration (M&A)

M&A activities are those defined as directly relating to the management and administration of THSGP funds, such as financial management and monitoring. Recipients may use up to five percent (5%) of the amount of the award for M&A, and where applicable, subrecipients may use up to five percent (5%) for M&A of the amount they receive.

3. Indirect 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 FEMA before indirect costs are charged to the award.

4. Allowable Costs

The following pages outline global allowable costs guidance applicable to THSGP. Allowable activities made in support of the THSGP priorities as well as other capability-enhancing projects must fall into the categories of planning, organization, equipment, training, or exercises (POETE). Additional detail about each of these allowable expense categories, as well as sections on additional activities including explicitly unallowable costs is provided. In general, recipients should consult their FEMA HQ Program Analyst prior to implementing any investment to ensure that it clearly meets the allowable expense criteria established by the guidance.

Recipients are encouraged to use grant funds for evaluating grant-funded project effectiveness and return on investment aligned to the relevant POETE element, and FEMA encourages grant recipients to provide the results of that analysis to FEMA.

Planning

Planning efforts can include prioritizing needs, updating preparedness strategies, and allocating resources across stakeholder groups (e.g., law enforcement, fire, EMS, health care systems,

public health, behavioral health, public works, rural water associations, agriculture, information technology, emergency communications, and the general public, including people with disabilities) and levels of government. Planning provides a methodical way to engage the whole community in thinking through the life cycle of potential crises, determining required capabilities, and establishing a framework for roles and responsibilities. Planning must include participation from all stakeholders in the community who are able to contribute critical perspectives and may have a role in executing the plan. Planning should be flexible enough to address incidents of varying types and magnitudes.

Planning activities should focus on the prevention, protection, mitigation, response, and recovery mission areas outlined in the Goal. All jurisdictions are encouraged to work with Citizen Corps Whole Community Councils, nongovernmental entities, and the general public in planning activities. Whole community planning should integrate program design and delivery practices that ensure representation and services for under-represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations. Tribes are encouraged to include disciplines responsible for the health, safety, education, and care of infants and children and those responsible for integrating the accessibility and functional needs of children and adults with disabilities. Recipients must use the CPG 101 v2 in order to develop robust and effective plans. For additional information, please see http://www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf.

Information on Citizen Corps Whole Community Councils and CERT programs can be found at: <http://www.ready.gov/citizen-corps> for Citizen Corps Whole Community Councils and at <http://www.fema.gov/community-emergency-response-teams> for CERT Programs.

Other preparedness activities include Youth Preparedness programs that support practitioners as they create and run programs in their communities. Resources are available at www.ready.gov/youth-preparedness. The Youth Preparedness Catalogue. The catalogue describes national, regional, and state-level programs. <http://www.fema.gov/media-library/assets/documents/94775>. For more information on the Council please visit: www.ready.gov/youth-preparedness-council.

The National Disaster Recovery Framework (NDRF) provides an overarching interagency coordination structure for the recovery phase for incidents covered under the *Robert T. Stafford Disaster Relief and Emergency Assistance Act* (Pub. L. No. 93-288, as amended) (Stafford Act) and significant non-Stafford Act incidents. The NDRF is a guide that promotes effective recovery and is a tool that can be used to efficiently direct pre-disaster recovery planning activities. For more information on the NDRF see <http://www.fema.gov/pdf/recoveryframework/ndrf.pdf>.

Continuity of Operations

DHS/FEMA is designated as the Department of Homeland Security's lead agency for managing the nation's Continuity Program. To support this role, FEMA provides direction and guidance to assist in developing capabilities for continuing Federal and state, territorial, tribal, and local

(STTL) government jurisdictions and private sector organizations' essential functions across a broad spectrum of emergencies.

Presidential Policy Directive 40, the National Continuity Policy Implementation Plan (NCPIP), Federal Continuity Directive 1 (FCD 1), Continuity Guidance Circular 1 (CGC 1), and CGC 2 outline continuity requirements for agencies and organizations and provide guidance, methodology, and checklists. For additional information on continuity programs, guidance, and directives, visit <http://www.fema.gov/guidance-directives> and <http://www.fema.gov/continuity-operations> or contact a [Regional Continuity Manager](#).

Organization

Recipients may use grant funds for organization activities, including:

- Paying salaries and benefits for personnel, including individuals employed to serve as qualified intelligence analysts. 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.
- Implementing standardized resource management concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before, during, and after an incident

Equipment

The 21 allowable prevention, protection, mitigation, response, and recovery equipment categories and equipment standards for THSGP are listed on the web-based version of the Authorized Equipment List (AEL) available at <https://www.fema.gov/authorized-equipment-list>. Unless otherwise stated, equipment must meet all mandatory regulatory and/or DHS-adopted standards to be eligible for purchase using these funds. In addition, agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment.

Grant funds must comply with [Information Bulletin \(IB\) 426](#) and may not be used for the purchase of the following unallowable equipment: firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed.

Recipients should analyze the cost benefits of purchasing versus leasing equipment, especially high cost items and those subject to rapid technical advances. Large equipment purchases must be identified and explained. For more information regarding property management standards for equipment, please reference 2 C.F.R. Part 200, including 2 C.F.R. §§ 200.310, 200.313, and 200.316.

Requirements for Small Unmanned Aircraft System

All requests to purchase Small Unmanned Aircraft System (SUAS) must comply with [IB 426](#) and must include the policies and procedures in place to safeguard individuals' privacy, civil rights, and civil liberties of the jurisdiction that will purchase, take title to, or otherwise use the SUAS equipment.

Training

Tribes are strongly encouraged to use THSGP funds to develop and/or maintain a homeland security training program. Allowable training-related costs under THSGP include the establishment, support, conduct, and attendance of training specifically identified under the THSGP and/or in conjunction with emergency preparedness training by other Federal agencies (e.g., the Department of Health and Human Services and the Department of Transportation).

Training conducted using THSGP funds should address a performance gap identified through an assessment or contribute to building a capability that will be evaluated through a formal exercise. Exercises should be used to provide the opportunity to demonstrate and validate skills learned in training, as well as to identify training gaps. Any training or training gaps evaluated through a formal exercise, including those for vulnerable populations including children, the elderly, pregnant women, and individuals with disabilities or access and functional needs should be identified in an AAR/IP.

All training and exercises conducted with THSGP funds should support the development and testing of the jurisdiction's Emergency Operations Plan (EOP), consistent with the priorities in the National Preparedness System. Recipients are encouraged to use existing training rather than developing new courses.

When developing new courses, recipients are encouraged to apply the Analysis Design Development and Implement, and Evaluate (ADDIE) model of instruction design <https://www.firstrespondertraining.gov>.

DHS/FEMA supports and encourages the coordination of all emergency preparedness training towards the achievement of the Goal. To this end, DHS/FEMA supports the establishment of a Tribal Training Point of Contact (TTPOC). The role of the TTPOC is to coordinate the tribes' training needs and activities with DHS/FEMA and DHS/FEMA's Federal training partners, and holds the same authority and roles that State training points of contact serve within State Administrative Agencies nationwide. DHS/FEMA will coordinate with Tribal Training Officers (TTO) as it relates to FEMA training when notified by recipients.

Per FEMA Policy (FP) 207-008-064-1 issued on September 9, 2013, states, territories, tribal entities and Urban Areas are no longer required to request approval from FEMA for personnel to attend non-FEMA training as long as the training is coordinated with and approved by the state, territory, tribal or urban area Training Point of Contact (TPOC) and falls within the FEMA mission scope and the jurisdiction's EOP. The only exception to this policy is for Countering Violent Extremism courses. For additional information on review and approval requirements for training courses funded with preparedness grants please refer to the following policy: <http://www.fema.gov/media-library/assets/documents/34856>. For additional information on training course review and approval requirements please refer to FP 207-008-064-1, Review and Approval Requirements for Training Courses Funded Through Preparedness Grants, issued on September 9, 2013. The Policy can be accessed at <http://www.fema.gov/media-library/assets/documents/34856>.

DHS/FEMA/National Training and Education Division (NTED) Provided Training

Trainings include programs or courses developed for and delivered by institutions and organizations funded by DHS/FEMA/NTED. This includes the Center for Domestic Preparedness (CDP), the Emergency Management Institute (EMI), and NTED's Training Partner Programs, including the Continuing Training Grants (CTG), the National Domestic Preparedness Consortium (NDPC), the Rural Domestic Preparedness Consortium (RDPC), and other partners.

NTED's National Preparedness Course Catalog

This online searchable catalog features a compilation of courses managed by the three primary FEMA training organizations: the CDP, EMI, and NTED. The catalog features a wide range of course topics in multiple delivery modes to meet FEMA's mission scope as well as the increasing training needs of Federal, state, local, territorial, and tribal audiences. All courses have been approved through NTED's course review and approval process. The catalog can be accessed at <http://www.firstrespondertraining.gov>.

Training Not Provided by DHS/FEMA. These trainings includes courses that are either state sponsored or Federal sponsored (non-DHS/FEMA), coordinated and approved by the SAA or their designated TPOC, and fall within the DHS/FEMA mission scope to prepare state, local, tribal, and territorial personnel to prevent, protect against, mitigate, respond to, and recover from acts of terrorism or catastrophic events.

- **State Sponsored Courses.** These courses are developed for and/or delivered by institutions or organizations other than Federal entities or DHS/FEMA and are sponsored by the SAA or their designated TPOC.
- **Joint Training and Exercises with the Public and Private Sectors.** These courses are sponsored and coordinated by private sector entities to enhance public-private partnerships for training personnel to prevent, protect against, mitigate, respond to, and recover from acts of terrorism or catastrophic events. In addition, states, territories, tribes, and urban areas are encouraged to incorporate the private sector in government-sponsored training and exercises.

Additional information on both DHS/FEMA provided training and other Federal and state training can be found at <http://www.firstrespondertraining.gov>.

Training Information Reporting System ("Web-Forms")

Web-Forms is an electronic data management system built to assist SAAs, designated TPOCs, and Federal agencies with submitting non-NTED provided training courses for inclusion in the State/Federal-Sponsored Course Catalog through electronic forms. The information collected is used in a two-step review process to ensure the training programs adhere to the intent of the HSGP guidance and the course content is structurally sound and current. As these programs may be delivered nationwide, it is vital to ensure each training program's viability and relevance to the Homeland Security mission. Reporting training activities through Web-Forms is not required under FY 2018 THSGP. However, the system remains available and can be accessed through the DHS/FEMA Toolkit located at <https://www.firstrespondertraining.gov/frt/> to support recipients in their own tracking of training deliveries.

Personnel Activities

Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable THSGP planning, training, exercise, and equipment activities.

Not more than 50 percent of total THSGP funds may be used for personnel activities as directed by the *Homeland Security Act of 2002*, as amended by the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act* (Pub. L. No. 110-412) (6 U.S.C. §609(b)(2)(A)). This cap may be waived per 6 U.S.C. § 609(b)(2)(B). For further details, THSGP recipients should refer to [IB 358: Clarification on the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 \(Public Law 110-412 – the PRICE Act\)](#), or contact their FEMA HQ Program Analyst.

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

Construction and Renovation

Construction projects are only permitted where they will assist the recipient to achieve target capabilities 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. THSGP funding may not be used for construction and renovation projects without prior written approval from FEMA. All recipients of THSGP funds must request and receive approval from FEMA before any THSGP funds are used for any construction or renovation. Additionally, recipients are required to submit a SF-424C Form and budget detail citing the project costs. The total cost of any construction or renovation paid for using THSGP funds may not exceed the greater amount of \$1,000,000 or 15 percent of the THSGP award.

Communications Towers

For the purposes of the limitations on funding levels only, communications towers are not considered construction. When applying for construction funds, including communications towers, at the time of application, recipients must submit evidence of approved zoning ordinances, architectural plans, and any other locally required planning permits.

When applying for funds to construct communication towers, recipients and subrecipients must submit evidence that the Federal Communication Commission's Section 106 review process has been completed and submit all documentation resulting from that review to DHS/FEMA/GPD prior to submitting materials for EHP review. Recipients and subrecipients are also encouraged to have completed as many steps as possible for a successful EHP review in support of their proposal for funding (e.g., coordination with their Tribal 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 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 FEMA HQ Program Analyst within six months of the award. Completed EHP review materials for construction and

communication tower projects must be submitted no later than 12 months before the end of the period of performance. EHP review materials should be sent to gpdehpinfo@fema.gov.

THSGP 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 no less than the prevailing wages for laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor (DOL) wage determinations, is available from the following website: <http://www.dol.gov/whd/govcontracts/dbra.htm>.

Multiple Purpose or Dual-Use of Funds

Many activities which support the achievement of target capabilities related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. However, all THSGP-funded projects must assist recipients and subrecipients in achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

Whole Community Preparedness

In addition to the [Citizen Corps Whole Community Councils and CERT programs](#) mentioned above, the following preparedness programs are allowable expenses:

- **PrepareAthon:** FEMA's Individual and Community Preparedness Division (ICPD) launched PrepareAthon™ (formerly America's PrepareAthon!) in 2013, with the goal of empowering individuals and communities to take action to improve their preparedness and resilience. The purpose of PrepareAthon is to motivate people and communities to take action to prepare for and protect themselves against disasters. Supported by FEMA, communities conduct PrepareAthon events year-round with a focus on encouraging participants to take specific actions to protect themselves from the disasters most likely to affect them and their community. PrepareAthon events are unique to each community and may be aligned to a particular theme in the Ready Campaign's National Seasonal Preparedness Messaging Calendar (www.ready.gov/prepare). PrepareAthon is a critical part of FEMA's overarching mission to support citizens and first responders to ensure that as a Nation we work together to build, sustain and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards.
- **Youth Preparedness Resources** to support practitioners as they create and run programs in their communities are available at www.ready.gov/youth-preparedness. One of these resources, the Youth Preparedness Catalog, identifies over 200 existing programs, curricula, and resources that may be of interest to those seeking an introduction to, or learning more about, youth preparedness programs. The Catalog describes national, regional, and state-level programs. The Catalog can be found at <http://www.fema.gov/media-library/assets/documents/94775>.

Other Allowable Costs

Maintenance and Sustainment

The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable, as described in FEMA Policy FP 205-402-125-1 (Additional guidance is provided in FEMA Policy FP 205-402-125-1, *Maintenance Contracts and Warranty Coverage Funded by Preparedness Grants*, located at: <http://www.fema.gov/media-library/assets/documents/32474>), under all active and future grant awards, unless otherwise noted.

Grant funds are intended to support the National Preparedness Goal and fund projects that build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order to provide recipients the ability to meet this objective, the policy set forth in GPD's [IB 379: Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for the expansion of eligible maintenance and sustainment costs which must be in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program, and (3) be tied to one of the core capabilities in the five mission areas outlined in the Goal. Additionally, eligible costs must also be in support of equipment, training, and critical resources that have previously been purchased with either Federal grant money or any other source of funding other than DHS/FEMA preparedness grant program dollars.

Critical Emergency Supplies

In furtherance of DHS's mission, critical emergency supplies, such as shelf stable food products, water, and basic medical supplies are an allowable expense under THSGP. Prior to allocating grant funds for stockpiling purposes, each Tribe must have FEMA's approval of a five-year viable inventory management plan, an effective distribution strategy and related sustainment costs if planned grant expenditure is over \$100,000.

The inventory management plan and distribution strategy, to include sustainment costs, will be developed and monitored by FEMA GPD with the assistance of the FEMA Logistics Management Directorate (LMD). GPD will coordinate with LMD and the respective FEMA Region to provide program oversight and technical assistance as it relates to the purchase of critical emergency supplies under THSGP. GPD and LMD will establish guidelines and requirements for the purchase of these supplies under THSGP and monitor development and status of the Tribe's inventory management plan and distribution strategy. Linkages between specific projects undertaken with THSGP funds and strategic goals and objectives will be highlighted through regular required reporting mechanisms.

If grant expenditures exceed the minimum threshold, the five-year inventory management plan will be developed and monitored by FEMA GPD with the assistance of the FEMA LMD.

Secure Identification

THSGP funds may be used to support the development and production of enhanced tribal documents (e.g., Enhanced Tribal Cards) designed to meet the requirements of the Western Hemisphere Travel Initiative (WHTI). More information on the WHTI may be found at

http://www.dhs.gov/files/programs/gc_1200693579776.shtm and
<https://www.cbp.gov/travel/us-citizens/western-hemisphere-travel-initiative>.

When completing the IJ Template, please refer to the Goal at for a list of the core capabilities that best fit the proposed activities and costs. For additional assistance in determining the core capabilities that fit the proposed WHTI project, please contact the CSID 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.

Appendix C – FY 2018 THSGP Investment Justification (IJ) Outline

Tribes should use the Excel 2003-based THSGP IJ Template (OMB Control Number: 1660-0113) for their THSGP application submission. If using a more recent version of Excel (e.g., Excel 2007) applicants should save the final version of the IJ in the Excel 2003 format before submitting. The THSGP IJ Template can be found at <http://www.fema.gov/grants> or <http://www.grants.gov>.

When applying for THSGP funding, it is recommended that Tribes use the name of the Tribe as listed in the Federal Register. Applicants can also contact the CSID to confirm the Tribe name as listed in the Federal Register.

Additional tips and helpful hints on how to complete the IJ Template can also be found in the THSGP Reference Guide at <http://www.fema.gov/grants>.

After the THSGP IJ Template has been completed in Excel, please upload the IJ Template as an attachment with the other required application materials (see Section D within the NOFO) to <http://www.grants.gov>.

THSGP Investment Justification Outline

Question	Response	Scoring Criteria
I. Background (N/S)		
I.A Provide the Tribe name	Short title (100 char. max.)	N/S
I.B Provide the Investment name:	Short title (100 char. max.)	
I.C Provide a baseline understanding of the spectrum of terrorism and natural hazard risks and demographics that the Tribe faces and influenced the development of this Investment Justification (IJ).	Narrative (2500 char. max.)	
II. Overview (25%)		
II.A Identify the Investment as:	<i>New, Ongoing</i>	N/S
If ongoing, describe the Investment’s current state and what will be accomplished prior to the application of FY 2018 funds. <i>Please note, if this Investment is marked “New”, please move to question II.B.</i>	Narrative (1500 char. max.)	

Question	Response	Scoring Criteria
II.B Identify if this Investment focuses on building new capabilities or the sustainment of existing capabilities	Building, Sustainment	
II.C Provide a description of this Investment, including the planning, organization, equipment, training, and/or exercises that will be involved.	Narrative (1500 char. max.)	The response provides a detailed description and clear understanding of various activities that will be supported by this Investment.
III. Baseline (25%)		
III.A Identify the goals and objectives that will be supported by this Investment. <i>Please note, this should be linked to the all-hazards risks identified in I.C.</i>	Narrative (1500 char. max.)	N/S
III.B Describe existing capability levels that address the identified goals/objectives and what will be in place to support the Investment prior to the use of FY 2018 funds.	Narrative (1500 char. max.)	The response provides a clear understanding of existing capability levels and what capability gap(s) the Investment will address.
III.C Explain the capability gap(s) that this Investment is intended to address. <i>Please note, this should be linked to the all-hazards risks identified in I.C.</i>	Narrative (1500 char. max.)	
IV. Project Management and Milestones (25%)		
IV.A Provide the proposed FY 2018 THSGP funding amount for this Investment.	Amount	N/S
IV.B Identify the amount and percentage of funding that will be dedicated to Management and Administration (M&A) expenditures. <i>Please note, M&A cannot exceed five percent (5%) of the total award amount.</i>	Amount/Percentage	N/S
IV.C Identify the National Preparedness Goal (NPG) core capabilities that are supported by this Investment. For each of the selected NPG core capabilities, provide the proposed funding amount to be obligated from this Investment.	Select all that apply and Amount	The response provides a clear demonstration and a comprehensive understanding of how the Investment supports identified National Preparedness Goal core capabilities and primary POETE Solution Area.
IV.D Provide the proposed funding amount to be obligated from this Investment towards the primary Planning, Organization, Equipment, Training, and Exercises (POETE) Solution Area.	Planning, Organization, Equipment, Training, Exercise	

Question	Response	Scoring Criteria
IV.E Each grantee must submit a detailed budget narrative, in addition to SF- 424A, explaining related costs and expenses as a part of the application. This budget narrative should be detailed and should serve to: (1) explain how the costs were estimated, and (2) justify the needs for the costs incurred to the measurable achievement outcomes as stated in the Investment Justification.	Narrative (1500 char. max.)	The response provides a clear explanation of how the funds will be utilized and demonstrates the need to achieve the outcomes.
IV.F Identify up to ten projects/activities, with start and end dates, which will be implemented over the 36 month period of performance (September 1, 2018 - August 31, 2021). Provide the following information: - Project Name - Funding Amount - Project Management Process - Start Month/Year - End Month/Year	Short title (100 char. max.) Amount Initiate, Plan, Execute, Control, Close Out Month/Year Month/Year	The response also provides a clear description of projects/activities that will demonstrate progress towards achieving the Investment.
IV.G Does this Investment require new construction or renovation, retrofitting, or modification of existing structures?	No/Yes	N/S
V. Accomplishments and Impact (25%)		
V.A Describe the measurable outputs and outcomes that will indicate if this investment is successful at the end of the period of performance. The outputs and outcomes should demonstrate improvements towards building capabilities described in Section III, Baseline.	Narrative (1500 char. max.)	The response provides a clear description of how the outcomes will be achieved during the FY 2018 THSGP period of performance. The response also describes how accomplishments will bridge capability gap(s) outlined in Section III, Baseline.
V.B Identify the mission areas that are supported by this Investment:	Select all that apply	N/S