



Maine Emergency Management Agency

Subrecipient Grant Guidebook

Revised September 2020



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Overview

The Maine Emergency Management Agency's (MEMA) Subrecipient Grant Guidebook is designed to assist subrecipients with grant management and administration. It is a supplement to the federal, state, and programmatic requirements that govern grant award administration. Subrecipients are responsible for familiarizing themselves with the actual grant award requirements. Any omission of federal, state, or local requirements from this manual does not waive a subrecipient's responsibility to comply with all applicable grant award requirements.

As per Presidential Policy Directive-8¹ and Maine Revised Statutes 37-B §§701-707 (2013)², MEMA will utilize grant funding to support the National Preparedness goal in establishing secure and resilient communities to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk. MEMA acts as the State Administrative Agency (SAA), recipient, and pass-through entity for all grants covered in this guidebook which include:

- **Homeland Security Grant Program (HSGP)**
 - State Homeland Security Program (includes the Law Enforcement Terrorism Prevention Program [LETPP])
 - Urban Areas Security Initiative Program (UASI)
 - Operation Stonegarden (OPSG)
- **Emergency Management Performance Grant (EMPG)**
- **Hazard Mitigation Assistance (HMA)**
 - Pre-Disaster Mitigation Grant (PDM)
 - Flood Mitigation Assistance (FMA)
 - Building Resilient Infrastructure and Communities (BRIC)
 - Hazard Mitigation Grant Program (HMGP)
 - Rehabilitation of High Hazard Potential Dams Grant Program (HHPD)
- **Nonprofit Security Grant Program (NSGP)**
- **State Emergency Response Commission (SERC) funding** (also known as Local Emergency Planning Committee funding (**LEPC**)) and includes match from the **Hazardous Materials Emergency Program (HMEP)**
- **Seabrook Nuclear Station funding**

MEMA welcomes any questions not covered by this guidebook and any suggestions to improve the content and utility. Please contact a program manager with any suggestions or questions.

¹<https://www.fema.gov/emergency-managers/national-preparedness>

²<http://legislature.maine.gov/legis/statutes/37-B/title37-Bsec701.html>

Grants Summary

Homeland Security Grant Program (HSGP)

State Homeland Security Program (SHSP)

The State Homeland Security Program (SHSP) is an all-hazards preparedness grant to help build and sustain core capabilities within each state and to mitigate and manage potential terrorist incidents or other hazards. This grant requires a minimum of 25% of funds to be allocated to law enforcement terrorism prevention program activities (LETPP) and 80% of funds passed through to local organizations. The point of contact email for this grant is HSGrants.Maine@maine.gov.

Urban Area Security Initiative (UASI)

The Urban Area Security Initiative (UASI) provides financial assistance to address the unique multi-discipline planning, organization, equipment, training, and exercise needs of high-threat, high-density urban areas, and to assist these areas in building and sustaining capabilities to prevent, protect against, mitigate, respond to, and recover from threats or acts of terrorism using the Whole Community approach. The point of contact email for this grant is the current MEMA HSGP program manager.

Operation Stonegarden (OPSG)

An operational law enforcement grant for State, Tribal, County and Local law-enforcement agencies to pay for the overtime, fringe benefits, mileage, fuel and equipment to support the US Border Patrol's mission of safeguarding our nation's border. OPSG is awarded as part of Maine's annual Homeland Security Grant Program award. The point of contact email for this grant is OSG.Maine@maine.gov.

Nonprofit Security Grant Program (NSGP)

The Nonprofit Security Grant Program provides funding for coordination and collaboration among public, private, state and local government agencies promote emergency preparedness for target hardening and other physical security enhancements and activities to nonprofit organizations that are at a high risk of terrorist attack. The point of contact email for this grant is the current MEMA HSGP program manager.

Emergency Management Performance Grant (EMPG)

The Emergency Management Performance Grant (EMPG) is an annual cost-share grant that assists state, local and tribal emergency management agencies with resources for emergency preparedness to ensure a for the protection of life and property from all-hazards. No pass-through requirement is mandated for the subrecipients. The EMPG is set to a federal fiscal cycle from October 1st to September 30th. The

overall performance period for EMPG is three (3) years, however MEMA subrecipients are limited to a fifteen (15) month performance period with a forty-five (45) day liquidation period.

The point of contact email for this grant is EMPGgrants.Maine@maine.gov.

Hazard Mitigation Assistance (HMA)

Pre-Disaster Mitigation Grant (PDM)

The Hazard Mitigation Grant Program (HMGP) aids in implementing long-term hazard mitigation planning and projects following a Presidential major disaster declaration. The point of contact email for this grant is the current State Hazard Mitigation Officer.

Flood Mitigation Assistance (FMA)

The Flood Mitigation Assistance Program provides funds for buildings insured by the National Flood Insurance Program for planning and projects to reduce or eliminate risk of flood damage. The point of contact email for this grant is the current MEMA HMGP program manager.

Building Resilient Infrastructure & Communities (BRIC)

The Building Resilient Infrastructure & Communities (BRIC) provides support for hazard mitigation projects for states, local communities, tribes, and territories in order to reduce risks faced from disaster to disaster. The point of contact email for this grant is the current MEMA HMGP program manager.

Hazard Mitigation Grant Program (HMGP)

The Hazard Mitigation Grant Program (HMGP) provides state, local, tribal and territorial governments funding in order to rebuild in a way that reduces, or mitigates, future disaster losses in the community. This grant funding is available after a presidentially declared disaster.

Rehabilitation of High Hazard Potential Dams Grant Program (HHPD)

The Rehabilitation of High Hazard Potential Dams Grant Program (HHPD) provides technical, planning, design, and construction assistance for eligible rehabilitation activities that reduce dam risk and increase community preparedness.

State Emergency Response Commission (SERC)

The State Emergency Response Commission (SERC) is the state planning and training program funded through a combination of the regulatory fees from the Tier II reporting facilities and the US Department of Transportation's **Hazardous Materials Emergency Preparedness Grant (HMEP)** in order to

increase awareness of and facilitate response to hazardous materials in local communities. MEMA manages both funding sources, through the Technological Hazards Program (THP). Upon submission, the THP determines the funding source to reimburse individual Local Emergency Planning Committee (LEPC) requests. The point of contact email for this funding is maine.serc@maine.gov

Seabrook Nuclear Power Station

The Seabrook Nuclear Station Funding is annual regulatory funding that provides for preparedness activities specific to a potential radiological release from the Seabrook Station within the Ingestion Pathway Zone (IPZ). The point of contact email for this funding is maine.serc@maine.gov.

Section 1: Compliance with Laws and Regulations

1.1 Office of Management and Budget (OMB) Guidance

Subrecipients of federal grant funds must comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) published by the federal Office of Management and Budget (OMB). The Uniform Guidance is consolidated in the Code of Federal Regulations (CFR), Title 2, Part 200, Subparts A through F and appendices³. These regulations, referred to collectively as “2 CFR 200,” are regularly referenced in this guidebook.

1.2 Consequences of Noncompliance (2 C.F.R 200.338)

Non-compliance with federal, state, and local laws and regulations may inhibit MEMA’s mission and may result in potential penalties for funding:

- Temporarily withhold cash payments pending correction of the deficiency by the subrecipient or more severe enforcement action by the Federal awarding agency or MEMA
- Disallow all or part of the cost of the activity or action not in compliance
- Whole or partly suspend or terminate the Federal award
- Initiate suspension or debarment proceedings
- Withhold further awards for the program.
- Other remedies that may be legally available

MEMA may also withhold next phase approval of a project, require additional or more detailed financial reports, additional project monitoring, and/or establish additional prior approvals. Subrecipients will be notified in writing of any non-compliance penalties. The subrecipient provide a corrective action plan or written statement justifying compliance within thirty (30) days of receipt of notification.

1.3 Examples of Noncompliance

Typical examples of non-compliance are, but are not limited to:

- Unwillingness or inability to attain project goals
- Unwillingness or inability to adhere to grant guidelines and federal compliance requirements
- Improper purchasing procedures for contracts and procurements
- Inability to submit reliable and/or timely reports

1.4 Contracts

Any contract entered into by the subrecipient must comply with local, state, and federal government contracting regulations. Grant applications must reflect any contracts. Contract deliverables must meet the intent of the grant application and grant requirements. Justification is required for compensation

³<https://www.ecfr.gov>

applicable to individual consultant services, which must be reasonable and consistent with the amount paid for similar services in the marketplace. Subrecipients must file detailed invoices, time sheets, and progress reports for all consultant expenditures.

1.5 Publications

Publications created with funding specific to the Department of Homeland Security, must prominently contain the following statement: “This document was prepared under a grant from the Federal Emergency Management Agency (FEMA)'s Grant Programs Directorate, U.S. Department of Homeland Security and the Maine Emergency Management Agency. Points of view or opinions expressed in this document are those of the authors and do not necessarily represent the official position or policies of FEMA's Grant Programs Directorate, the U.S. Department of Homeland Security or the State of Maine”.

1.6 Additional Regulations

Additional regulations governing MEMA subawards include, but are not limited to:

- Federal, state, and local laws, statutes, rules, and ordinances, as applicable;
- Federal award: the signed agreement between MEMA and the federal agency providing funds. Terms and conditions of the federal award that are applicable to subrecipients are incorporated into the Grant award Agreement;
- Grant Contract: a signed agreement that documents the legal relationship between MEMA and the subrecipient which describes each party's roles and responsibilities;
- Other federal or state programmatic requirements or guidelines. These are generally communicated to the subrecipient through grant award-related materials such as the request for proposal, application, and Grant award Agreement; or via relevant agency websites and publications.

Section 2: Application Process

Overview

MEMA will post application instructions and the Notice of Funding Opportunity (NOFO) on their website. These opportunities are dependent on grant cycles issued by the Federal Government.

Applications will be reviewed in the following areas:

- Relevance to MEMA’s policy priorities (i.e. Grant Justification, Program Work Plans, Threat and Hazard Identification and Risk Assessment, State Preparedness Report, State Homeland Security Strategy)
- Ability to meet any award “special conditions” as specified in grant guidance
- Ability to achieve project timelines and milestones
- Ability to expend grant funds in a timely manner
- Timeliness and justification for award extensions and reallocations on previous grant awards
- Ability to comply with procurement and contracting requirements
- Ability to comply with equipment management and reporting requirements
- Ability to participate in mandatory grant management training and procurement training
- Required: Detailed Budget for project activity
- **Other forms may be required as the individual grant NOFOs warrant**

All applications will be reviewed for completeness, compliance to grant guidelines, and project alignment to core capabilities. Grants may also be reviewed with further criteria, as deemed necessary, per the NOFO. Applicants that submit applications that, after review, are deemed incomplete or ineligible, will be notified via email or letter. Grant applications that are reviewed and recommended for funding will receive a grant award notification letter from MEMA.

2.1 Federal Notice of Funding Opportunity (NOFO)

The Federal Notice of Funding Opportunity (NOFO) is distributed electronically to each state. Each NOFO is grant specific and contains grant program intent, allowable/disallowable costs, application guidelines, performance period, allocation, and helps the applicant determine eligibility.

2.2 Application Denial

Applications that are denied will be issued an official denial letter from MEMA to the applicant’s authorized official.

2.3 Applicant Eligibility

All subrecipients must have an active Dun and Bradstreet Data Universal Numbering System (DUNS) number in order to apply for federal funding. In addition, all subrecipients must register with the System

for Award Management (SAM) database⁴. SAM is the primary registrant database for the U.S. Federal Government and subrecipients are required to update or renew their registration at least once per calendar year to maintain an active status. Failure to maintain an active status will potentially result in de-obligation of all federal funds.

Subrecipients deemed eligible to receive federal grants, contracts, and other activities are required to adopt the National Incident Management System (NIMS). NIMS provides a consistent nationwide approach and vocabulary to enable all levels of government, tribal nations, nongovernmental organizations, and private sector partners to work together to prevent, protect against, respond to, recover from, and mitigate the effects of incidents, regardless of cause, size, location, or complexity.

MEMA requires that all subrecipients of non-disaster federal grant funds be NIMS compliant and must submit their NIMS implementation survey by the 2nd Friday of December each year.

Subrecipients unable to adhere to NIMS standards, as outlined in this guidebook, are required to submit a Corrective Action Plan to MEMA prior to the December 31st deadline. Please visit the MEMA website for further information concerning NIMS implementation and compliance. This deadline may change as federal guidance requirements dictate.

All funded personnel through EMPG are required to have completed or be working towards the NIMS National Standard Curriculum Development Guide, which includes completion of: IS 100, IS 200, IS 700, IS 800; and the Professional Development trainings of: IS-120.a, IS-230.d, IS-235.b, IS-240.b, IS-241.b, IS242.b, IS-242.b, and IS244.b; or the Emergency Management Professionals Program (EMPP) Basic Academy:, E/L 101, E/L 102, E/L 103, E/L/K 0146.

2.4 Grant Award

All grant awards issued by MEMA will include terms and conditions that include compliance requirements, federal regulations, and audit requirements pertinent to the grant award. Each subrecipient's authorizing agent shall sign compliance documents prior to the spending of any award.

- **Grant Assurances**, which include:
 - Single Audit Act of 1996
 - Certification of Lobbying/Drug-Free Workplace
 - Environmental and Historic Preservation Screening Form (if applicable)
 - Anti-Discrimination Policies
- **Grant Progress Report Form**
- **Grant Reimbursement Request Form**
- **Equipment Inventory Form**

⁴ <https://www.sam.gov>

Subrecipients receiving awards must sign and return the grant assurances within thirty (30) days from the date of the award letter. In the event the subrecipient needs an extension to accept the award, please contact the appropriate program manager to discuss extension procedures.

2.5 Changes to Award

All change requests to an award, whether it is programmatic or financial, must be submitted to the applicable Program Manager by submitting a written narrative and, if necessary, a revised budget signed by the authorizing agent. Changes must be consistent with grant guidelines to be eligible for approval. Subrecipients' reporting requirements must be current, and all other terms and conditions must be met at the time of the change request. Transferring of funds will only be authorized by MEMA and will require the submittal of Grant Contract Modification Form with a new budget breakdown for grant files.

Examples of Change Requests:

- Change of address
- Changes in project scope
- Changes in project detail
- Changes in budget
- Changes in work plan
- Changes in grant justification
- Changes that increase or decrease the total cost of the project
- Change in, or temporary absence of, the project manager, chief financial officer, or signatory official
- Release of special conditions, if required

2.6 Restrictions on Changes to Award

- The original grant award budget must be completed prior to Period of Performance
- Changes may be made, subsequent to the initial ninety-day award period until ninety (90) days prior to close out.
- Grant budgets may not be changed ninety (90) days prior to the end of the grant, except for EMPG grant program.

2.7 Basic Federal Grant Conditions

All subrecipients must follow the basic federal grant conditions outlined below:

Audit Requirement of Federal Fund (2 CFR §200.501)

These requirements apply to non-profit organization, institution of higher education, and local governments when they, or one of their departments, receives federal funds. Any nonprofit organization, institution of higher education, or local government receiving more than \$750,000 in federal funds from all sources within a 12-month period must have a single audit performed on the use of the funds. Each subrecipient shall sign assurances to abide by this requirement.

Transparency Act Reporting of Federal Funds

The Federal Funding Accountability and Transparency Act (FFATA) requires MEMA to report specific subrecipient award information for each award greater than \$25,000 in federal funds received after October 1, 2010. Prior to receiving funds, each subrecipient will be solicited for information, when necessary, to supply MEMA with the proper information necessary to meet this requirement.

Cost Principles (2 CFR §200.400 - .475)

These requirements apply only to state and local government subrecipients. These regulations list and define general categories of costs that are both allowable and unallowable.

MEMA utilizes the “Value of Volunteer Time” rate for the State of Maine as established by the Independent Sector⁵, a national network of nonprofits and foundations. The Maine volunteer rate is updated annually and retained throughout the performance period of a grant.

Nondiscrimination Requirements

Any recipient of federal funds must comply with 28 CFR Part 42 along with their subcontractors, all statutorily-imposed nondiscrimination requirements such as civil rights requirements, reporting of adverse finding of discrimination, equal opportunity program requirements, which may also include, but not limited to:

- Omnibus Crime Control and Safe Streets Act of 1968;
- Victims of Crime Act;
- Juvenile Justice and Delinquency Prevention Act of 2002;
- Civil Rights Act of 1964;
- Rehabilitation Act of 1973;
- Americans with Disabilities Act of 1990;
- Education Amendments of 1972;
- Age Discrimination Act of 1975;
- Ex. Order 13279 (equal protection of the laws for faith-based and community organizations);
- 28 C.F.R. pt. 38 (U.S. Department of Justice Equal Treatment for Faith-Based Organizations)

2.8 Administrative Guidelines

The following are basic administrative conditions that apply to all federal grants:

Grants and Cooperative Agreements with State & Local Governments (2 CFR §200.201)

This regulation establishes consistency and uniformity among Federal agencies in the management of grants and cooperative agreements with state, local, and federally recognized Indian tribal governments.

⁵ https://independentsector.org/resource/vovt_details/

Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations (2 CFR §200.100 - .345)

This regulation establishes administrative requirements for Federal grants and agreements awarded to institutions of higher education, hospitals, and other non-profit organizations. Federal Agencies may apply provisions to commercial organizations.

2.9 Additional Cost Guidelines

The following are basic federal cost guidelines:

Cost Principles for Educational Institutions (2 CFR §200.400 - .475)

This regulation establishes principles for determining costs applicable to grants, contracts, and other agreements with educational institutions identified in the Grant Assurances Form.

Cost Principles for Non-Profit Organizations (2 CFR §200.400 - .475)

This regulation establishes principles for determining costs of grants, contracts, and other agreements with non-profit organizations identified in the Grant Assurances Form. A list of nonprofit organizations that are exempt from these principles can be found at 2 CFR §200 - Appendix VIII to Part 200.

2.10 Special Conditions

Subrecipients with special conditions on their awards are prohibited from expending any funds until those identified conditions are approved by MEMA. Typical special conditions may be, but are not limited to, NIMS compliance, Environmental and Historic Preservation (EHP) review, and attendance at grant award kick-off, rollout meetings, and trainings. Failure to comply with any and/or all special conditions may result in de-obligation of grant funding.

Section 3: Environmental and Historic Preservation

Overview

Federal Environmental and Historic Preservation (EHP) laws and Executive Orders are aimed at protecting our nation's water, air, coastal, wildlife, land, agricultural, historical, and cultural resources, as well as minimizing potential adverse effects to children, low-income, and minority populations. All grant awards are subject to EHP screening.

3.1 Process and Timeframe

All grant awards are subject to EHP review. Subrecipients receiving in part or full grant funds must submit, through MEMA, an EHP review and approval before initiation, unless expressly exempted from the requirement. Projects that may trigger an environmental review include, but not limited to, debris removal, emergency protective measures, equipment installation, new construction, and ground disturbance. Exercise and Training projects with any field-based component (drill and full-scale exercises) require EHP review. Failure to comply with this requirement could result in project delays and denial of funding.

If a proposed project falls within one of the exempted project types, the subrecipient must include a written explanation in the Project Management Plan (PMP) detailing why the project falls within that exemption. MEMA may reject the PMP to revise the EHP section if the justification is insufficient.

Subrecipients should allot at least 45-60 days for the EHP approval process.

a. EHP Screening Form

Subrecipients must fill out FEMA's EHP Screening Form 024-0-1⁶ in order to initiate the EHP process. Completion of the form does not complete the EHP review; it initiates the process.

Section A of the EHP Screening Form provides the grant information needed by the FEMA Grant Program Directorate to process the request. This section contains the scope of work which provides a "word picture" of the project. A word picture is best if it contains the five "W's" (Who, What, When, Where, Why) and "How" in the Project Description. A good scope of work in Section A will enhance the context of additional provided documentation. See **Figure 3.1** for a good example of a completed EHP Screening Form Section A.

b. Additional Required Documentation

The EHP Submission requires colored photographic documentation, equipment specification sheets, and other applicable documentation. All photographic and other documentation must be correlated into a Word document or Power Point and cannot be submitted as individual items or in a different format.

⁶ <https://www.maine.gov/mema/grants/environmental-planning-historical-properties>

The colored photographs and specification sheet presentation should illuminate the project, primarily for the EHP reviewer to understand any potential environmental or historical impact. Examples of completed EHP screening forms and the back-up colored photographs and specification sheet documentation presentations are available on the MEMA website.

c. EHP Submission & Approval

The completed EHP screening form and Additional Documentation Word document/Power Point must be submitted to MEMA for state level review, after which it will be forwarded to FEMA Grant Program Directorate as an official review request. At any time during the EHP screening progress, MEMA may request additional information or require the screening request be modified.

Once approved, FEMA will send an electronic EHP Clearance memo to MEMA which authorizes the start of the procurement process or project. The memo authorizes the project only within the scope of work described in the screening form. EHP Clearance memo is required as documentation in a request for reimbursement for HSGP and EMPG.

Changes to Scope of Work

Changes to scope of work to an already approved EHP project may invalidate EHP clearance. Consult with MEMA program manager prior to determine if an additional EHP request is required.

Figure 3.1. Completed Section A

SECTION A. PROJECT INFORMATION

DHS Grant Award Number:.....EMW-2015-SS-00038

Grant Program:.....State Homeland Security Program

Grantee:.....Maine Emergency Management Agency

 Grantee POC:.....Mr. John Doe Manager

 Mailing address:.....72 SHS, Augusta, ME 04333-0072

 E-mail:.....john.d.manager@maine.gov

Sub-grantee:.....Somewhere County EMA

 Subgrantee POC:.....Jane Doe Director

 Mailing address:.....123 Elm St, Whereaml, ME 04000

 E-mail:.....jane.d.director@somewheremaine.com

Estimated cost of project:.....\$25,000.00

Project title: ABC High School Video Surveillance Security Project

Project location (physical address or latitude-longitude): 284 Walker Mills Road, Somewhereelse, ME 04000

Project Description. Provide a complete project description. The project description should contain a summary of what specific action is proposed, where it is proposed, how it will be implemented. Include a brief description of the objectives the project is designed to accomplish (the purpose), and the reason the project is needed. Use additional pages if necessary. If multiple sites are involved, provide the summary for each site:

This project will enhance security and surveillance of ABC High School. The new system will allow monitoring of interior entrances and security sensitive areas from inside the high school building by administrative staff and will be networked off-campus sites, including the district administrative offices and county sheriff office.

This is the second phase of a two-part project: the first involved upgrading the server within the facility to support the installation of the cameras throughout the facility. Six cameras will be installed at key areas previously identified, as well as the installation of network wiring for the cameras, associated hardware connections, system set-up and programming.

The ABC High School has a school census of 425 students and 50 staff from 0630 through 1630. The facility is in use until 2200 daily and hosts Adult Education classes in the evening.

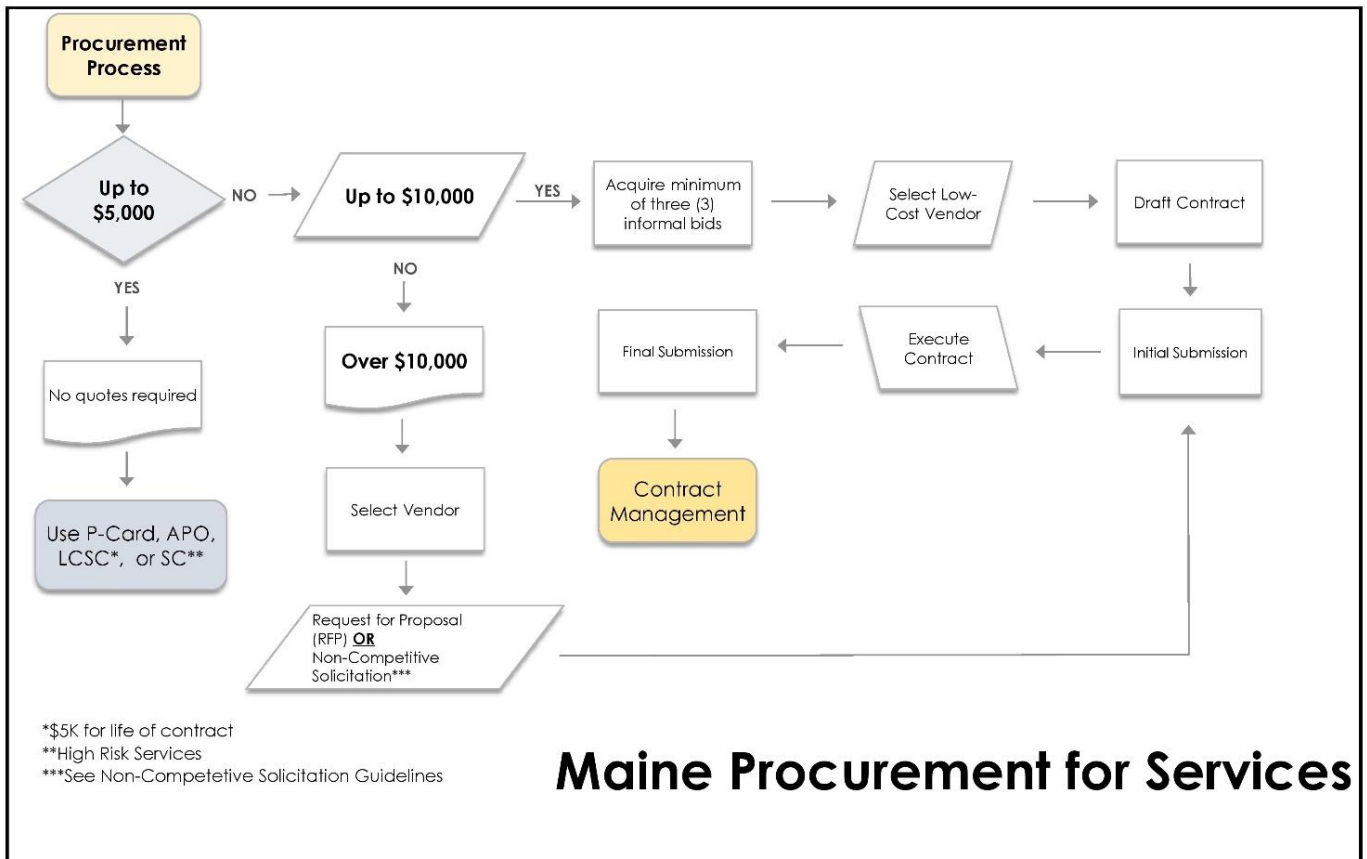
The impact to the community if this project is not approved will be unsustainable increases in security costs

Section 4: Procurement Process

Overview

Subrecipients using federal or state financial assistance will comply with local, state 5 M.R.S.A. 1825-B⁷, and federal law and standards per 2 CFR Section 200.318 through 326.

Figure 4.1. State of Maine Procurement Thresholds and Process



4.1 General Procurement Standards (2 CFR 200.318)

a. Documented Procedures

Subrecipients must use its own documented procurement procedures which reflect applicable State, local and tribal laws and regulations, provided that the procurements conform to applicable Federal law and standards.

b. Contractor Oversight

Subrecipients must maintain oversight to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

c. Necessity

Subrecipients must have procedures that avoid acquisition of unnecessary or duplicative supplies or services, and consideration should be given to breaking out sections to obtain a more economical purchase.

d. Cost Effectiveness

Subrecipients are encouraged to enter into state and local intergovernmental agreements or inter-equity agreements, where appropriate, for procurement or use of common, shared goods, and services, use Federal excess and surplus property in lieu of purchasing new equipment and property whenever feasible and reduces project costs.

f. Standards of Conduct

Subrecipients must maintain written standards of conduct covering conflicts of interest and governing the performance of employees engaged in the selection, award, and administration of contracts.

- These standards must provide for disciplinary actions
- Must cover organizational conflicts of interest if the subrecipient has a non-governmental parent, subsidiary, or affiliate

g. Conflict of Interest

No employee, officer, or agent must participate in the selection, award, or administration of a contract supported by a Federal award if they have a real or apparent conflict of interest. The officers, employees, and agents of the subrecipient must neither solicit nor accept gratuities, favors, or anything else of monetary value from contractors/subcontractors.

h. Value Engineering

Subrecipients are encouraged to use value engineering clauses in contracts for construction projects of enough size to offer reasonable opportunities for cost reductions.

i. Awards to Responsible Contractors

must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement, and will consider such matters as:

- Contractor integrity
- Compliance with public policy
- Record of past performance
- Financial and technical resources

⁷ <http://www.mainelegislature.org/legis/statutes/5/title5sec1825-B.html>

j. Records

Subrecipients must maintain records which detail the history of the procurement, which include, but are not limited to, rationale for the method of procurement, selection of contract type, contractor selection, and the basis for the contract price.

k. Time and Materials Contract

Subrecipients may use time and materials (T&M) contracts only after a determination that no other contract is suitable and includes a ceiling price that the contractor exceeds at their own risk. A T&M type of contract means a contract whose cost to subrecipients is the sum of:

- The actual cost of materials
- Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

l. Settlement of Issues

Subrecipients alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual issues.

4.2 Competition (2 CFR 200.319)

- a.** Subrecipients must conduct procurement transactions in a manner that provides full and open competition. Situations considered to be restrictive of competition include:
- Placing unreasonable qualifying requirements on firms
 - Requiring unnecessary experience and excessive bonding requirements
 - Noncompetitive pricing practices between firms or affiliated companies
 - Organization 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
- b.** Subrecipients are prohibited from using statutorily or administratively imposed state or geographical preferences.
- c.** Subrecipients must have written procedures for procurement transactions that ensure:
- Clear and accurate descriptions of the technical requirements for material, product or services
 - Identify all requirements that all prequalified persons, firms, or products must fulfill and all other factors to be used in evaluating bids or proposals; must not preclude potential bidders qualifying during the solicitation period

4.3 Contracting with Small and Minority Business, Women’s Business Enterprises, and Labor Surplus Area Firms (2 CFR 200.321)

Organizations must take the following affirmative steps to ensure these firms are used when possible:

- Place qualified small, minority, and women-owned business on solicitation lists
- Assure that such businesses are solicited when they are potential sources
- Divide total requirement, when economically feasible, into smaller task or quantities to permit maximum participation by such businesses
- Establish delivery schedules, where the requirement permits, which encourage participation by such businesses
- Use services and assistance, as appropriate, of such organization such as Small Business Administration Require prime contractors to take the same affirmative steps.
- The prime contractor, if subcontracts are allowed, to take affirmative steps listed above

4.4 Domestic Preference for Procurements (2 CFR 200.322)

Organizations must provide a preference for the purchase of goods, products or materials produced in the United States (including but not limited to iron, aluminum, steel, cement and other manufactured products), as appropriate and to the greatest extent consistent with law. The requirements of this section must be included in all contracts and purchase orders for work or products under this award.

- “Produced in the United States” means, for iron and steel products, that all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States.
- “Manufactured products” means items and construction materials composed in whole or in part of non-ferrous metals such as aluminum; plastics and polymer-based products such as polyvinyl chloride pipe; aggregates such as concrete; glass, including optical fiber; and lumber.

4.5 Procurement of Recovered Materials (2 CFR 200.323)

Organizations must comply with §6002 of the Solid Waste Disposal Act for procuring items designated in the EPA guidelines of 40 CFR 247

- Procurements must contain the highest percentage of recovered materials practical, consistent with maintaining satisfactory levels of competition, when the purchase price exceeds \$10,000
- Procuring solid waste services in a manner that maximizes energy and resource recovery
- Establishes an affirmative procurement program for recovered materials

4.6 Contract Cost and Price (2 CFR 200.324)

All procurement in excess of the Simplified Acquisition Threshold of \$250,000 must have a cost or price analysis performed, including contract modifications. Method and degree of analysis can vary

given the situation, but as a starting point an independent estimate must be made before receiving bids or proposals.

- Profit must be negotiated as a separate element of the price for each contract in which there is no price competition and, in all cases, where cost analysis is performed.
- Cost or prices based on estimated cost for contracts are allowable to the extent the costs incurred or estimates included in the negotiated prices would be allowable under the Federal cost principles.
- Cost plus a percentage of cost must not be used.

4.7 Procurement Review (2 CFR 200.325)

Subrecipients must make available, upon request, technical specifications on proposed procurements to ensure the item or service is the one being proposed for acquisition.

4.8 Bonding Requirements (2 CFR 200.326)

Bonding may be required for construction/facility improvement contracts/subcontracts exceeding the Simplified Acquisition Threshold (\$250,000) to ensure the Federal interest in the procurement is adequately protected.

4.9 Contract Provisions (2 CFR 200.327 and Appendix II)

Subrecipients' contracts must contain certain applicable provisions described in Appendix II of Part 200-Contract Provisions for Non-Federal Contracts under Federal Awards.

Section 5: Reimbursements

Overview

Reimbursements will be based upon authorized and allowable expenditures and be consistent with grant justifications, work plans, project narratives, project budget details, and grant guidance. Reimbursement of expenditures are to be submitted with the appropriate Grant Reimbursement form(s) and required documentation. MEMA will disperse funds in a timely manner but will not provide advanced drawdowns unless otherwise approved.

Payments may be withheld due to lack of supporting documentation or deficiency correction. Subrecipients will receive a written notice or denial of reimbursement that has been submitted, if the subrecipient fails to provide requested additional documentation within fifteen (15) days of the original request for reimbursement. Subrecipients are required to follow, at a minimum, local or State of Maine Purchasing Laws as outlined in 5 M.R.S.A. 1825-B for all procurements and contracts, whichever are more stringent.

If a subrecipient elects to pass through funds via a grant award agreement to any organization, MEMA requires the documentation mandated for proof of encumbrance, proof of purchase, and proof of payment from that organization to validate the funds were properly expended. For example, if a subrecipient receives funds to purchase medical supplies for the region and elects to pass through these funds to area hospitals or clinics, the subrecipient is responsible for providing documentation to support the hospital or clinic's proof of encumbrance, proof of purchase, and proof of payment. **Note: Pass through funds are unallowable under EMPG**

5.1 Forms

- The Reimbursement Request Form (RRF) is utilized for all programs except EMPG. The RRF is located on the MEMA website under each applicable grant program. Each reimbursement request is for a single program and individual grant year – do not combine programs or grant years on a single reimbursement request. Forms must be completed in their entirety as applicable to each grant program and be accompanied by all required supporting documentation.
 - Vendor Code: assigned by the State of Maine and is required in order for the subrecipient to receive payment. Visit the State of Maine Department of Administrative and Financial Services, Office of the State Controller website⁸ for details.
 - Subrecipient Invoice Number: These are unique to each subrecipient and are sequential. Each consists of subrecipients' MEMA assigned abbreviation (e.g. KC for Kennebec County, WO for Waldo County, etc.), last two digits of calendar year (e.g. "17" for 2017, "20" for 2020, etc.), two digits for the month of the request (e.g. "01" for January, "10" for October, etc.), and two number representing the sequence of the subrecipient's request for the calendar year (e.g. "01" for the first request, "60" for the sixtieth, etc.).

⁸ <https://www.maine.gov/osc/accounting/vendor-information>

For example: WR171045 would reflect the forty-fifth request of calendar year 2017 made in the month of October for Whatever County.

- Contract Number: Unique to each grant and subrecipient, located in the upper right corner on the Grant Contract.
- EMPG utilizes an invoice template for reimbursements and incorporates a section for In-Kind Contributions and Overtime Backfill. The invoice template must be completed in its entirety per grant program requirements and be accompanied by required supporting documentation.

5.2 Proof of Payment

Acceptable proof of payment is outlined as below:

- Payments made by cash will be by invoice or receipt reflecting paid in full and a complete cash transaction (e.g. change provided back, amount still due \$0.00, etc.)
- Payments made by check will be invoice or receipt reflecting the check number along with a copy of the cancelled check, a copy of automated transaction ledger showing outlay of funds, or a copy of bank statement reflecting the payment
- Payments made by credit card will be by invoice or receipt or copy of credit card statement with the charge indicated

Additional required documentation that shall accompany a reimbursement request are:

- **Personnel Costs:** Payroll reports must be signed and certified by the Chief Financial Officer or authorized representative. Payroll reports must include the employee name, position, coded allocation to the project and amount paid. Staff may not self-certify their own time and wages.

The subrecipient must retain and file all supporting payroll records, including time and attendance records, signed by the employee and supervisor as per federal recordkeeping requirements.

- **OPSG only** – include all Daily Activity Reports along with proof of payment for personnel and equipment.
- **Program Income and Local Match:** Program income may be used to supplement project costs, reduce project costs, or may be refunded to the federal government. It must be used for allowable program costs and be expended prior to requests for reimbursement. Local matching funds must clearly support the source, the amount, be documented and filed. Further detail on policy and procedures can be found in 2 CFR §200.306.
- **Equipment:** Allowable equipment categories are listed on the Authorized Equipment List (AEL) which is located on the MEMA website along with any updated Information Bulletins regarding Controlled Equipment. Subrecipients must follow state and local procurement procedures, must keep records, and submit acceptable proof of payment for reimbursement related to the purchase of the equipment. Further details on this policy can be found in 2 CFR §200.313 and Appendix A of this document.

- **Travel:** All subrecipient travel must be include in the subrecipient’s grant application or in an approved change request. Reimbursement for travel shall be calculated, in accordance with local written policy or state mileage and per diem rates. Further details on this policy can be found on the State of Maine Department of Administrative and Financial Services, Office of the State Controller website⁹. The travel must be directly related to the approved grant award or it will be disallowed. Reimbursement for travel will be awarded based on the supporting documentation provided; however, reimbursement will not exceed the state per diem rate. If lodging costs exceed the maximum lodging rate, per the state policy, approval from MEMA must be obtained prior to the commencement of travel for reimbursement to be considered.
- **Training:** All subrecipient training must be in the subrecipient’s grant application or in an approved change request prior to registering or participating in training opportunities. Except for EMPG, training reimbursements must be accompanied by the appropriate grant reimbursement form signed by the authorizing agent or financial agent, detailing all overtime and backfill expenditures. Supporting documentation for reimbursements must also include training certificates, signed timesheets with name/wage /hours, and agendas for the trainees.
- **Overtime and Backfill:** All overtime and backfill must be documented in the subrecipient’s grant application or in an approved change request prior to incurring expenses. All personnel costs are subject to the funding restrictions identified by the PRICE Act (Public Law 110-412).

➤ **Exercise:**

EMPG: All subrecipient exercise(s) should be entered on the MEMA Training and Exercise shared spreadsheet. Exercise reimbursements must be accompanied by the appropriate reimbursement request form signed by the authorizing agent or financial agent, detailing all overtime and backfill expenditures. Supporting documentation for reimbursements must also include the sign in/out sheet, removing all federally funded attendees and the coinciding agenda.

HSGP: All exercises which are grant funded require submission of an After-Action Report (AAR) within ninety (90) days after conclusion of the exercise.

- **Food and Beverages:** Per cost principle allowances, food and/or beverage expenses provided by subrecipients may be allowable costs if related to a grant-funded exercise, training, or conference provided it is allowable in grant guidance. At a minimum, subrecipients must conform to the local written meal allowance policy or State’s meal allowance policy. All food and beverage costs must be preapproved by MEMA prior to reimbursement. (2 CFR §200.407)
- **Unallowable Expenses:** Alcohol or bar charges, laundry charges, VISA or passport charges, tips, phone calls, personal hygiene items, in-room movies, magazines, personal transportation, travel insurance, credit card fees, lodging costs associated with violation of the lodging facility’s policies, lodging in excess of federal or state per diem as applicable. (2 CFR §200.410)

⁹ <https://www.maine.gov/osc/travel>

- **In-Kind Services & Contributions:** These are grant program specific and are stipulated on the Grant Contract. In-Kind Services and Contributions include, but are not limited to, volunteer services or donated goods. A complete In-Kind Guidance is available on the MEMA website under the applicable grant programs.¹⁰

5.3 Grant Contract Modification Form (GCMF)

A Grant Contract Modification Form (GCMF) is required for any change to the approved scope of work and/or budget during the performance period covered by the original Grant Contract. GCMF is located on the MEMA website under each respective grant program and must be submitted MEMA via the respective grant program email address. Once reviewed, the approval or disapproval will be sent back to the subrecipient along with any clarifying comments and instructions. Subrecipients must retain the GCMF with approval or disapproval for their records. GCMF's include the following requests:

- Request for Advance Payment (Unallowable for EMPG)
- Personnel Change
- Modification related to Scope of Work
- De-obligation of unspent Grant Award (along with closeout report)

5.4 Retention of Records

The subrecipient is responsible for maintaining a grant award file that contains complete and up-to-date records. These records may be paper files and/or electronic, provided that the files are easily and quickly accessible and available for review. Additionally, grant award files should be transitioned between subrecipient staff during any staff turnover.

The grant award files must be kept by the subrecipient for a period of no less than three (3) years from the date of the end of the Federal award period of performance, or three (3) years from the date of any audit that includes the grant award as part of the tested sample, whichever is later. At a minimum, the grant award file should contain the following documents:

- Signed Grant Contract
- Applicable Federal terms and conditions
- Applicable District terms and conditions
- NOFO
- All award adjustments, sign
- All quarterly status reports, if applicable
- Noteworthy results and/or deliverables (proof of equipment, training, plans/procedures, exercise product, etc.)
- Procurement files (including contracts and purchase orders) associated with the grant award
- Payment information that supports grant award-related charges, including invoices, reimbursement requests and proofs of payment
- Subrecipient handbook

¹⁰ <https://www.maine.gov/mema/grants/emergency-management-grant-program>

➤ Equipment inventory

MEMA understands that procurement and payment documents may be stored elsewhere if that is the subrecipient's standard procedure; however, the subrecipient must ensure that procurement and payment information for all grant-funded purchases are clearly identified and produced when requested.

5.5 Accountability

Subrecipients are responsible for tracking their grant balances. MEMA does track subrecipient payments and balances for state and federal reporting purposes and will reconcile grant payments and balances on a periodic basis. MEMA can assist subrecipients with determining current grant balances upon request.

Section 6: Reports

6.1 Bi-Annual Progress Reports

Except for EMPG, Subrecipients will submit a Grant Progress Report form to MEMA biannually on September 30th and April 30th. Forms can be found on the MEMA website under the applicable grant program. Forms must be signed by an authorized agent or delegated representative of the subrecipient to be considered complete.

The Grant Progress Report form details the status of the project, compares actual accomplishments to the objectives established for the reporting period in the project timeline, reasons for any deviation, and provides justification for timeline adjustment requests. Subrecipients should include any significant events or activities that occurred during the reporting period.

All exercise purchases must include an After-Action Report/Improvement Plan (AAR) and follow Homeland Security Exercise and Evaluation Program (HSEEP) guidelines.

6.2 Daily Activity Reports (DAR) (OPSG Only)

The website Max.gov¹¹ is to be utilized to report all patrols conducted. The County Sheriff's offices will be responsible for reporting all friendly force patrols.

¹¹ <https://portal.max.gov/portal/home>

Section 7: Monitoring

Overview

MEMA is required to conduct periodic monitoring of subrecipients to demonstrate that the subrecipients are in compliance with programmatic and financial requirements such as program goals, objectives, timelines, budgets, and other related program criteria. Monitoring will be either office-based (desk) and/or on-site visits which will be conducted for each subrecipient annually.

Annual risk assessments will be completed for each subrecipients. The top 3% of subrecipients with the highest scoring risk assessment scores will have an on-site monitoring visit during that fiscal year. However, mandatory on-site monitoring visits are required for all subrecipients at least once every two years, regardless of risk assessment results.

See Programmatic Monitoring Policy (Appendix C) for additional details.

7.1 Single Audit

Any subrecipient that expends over \$750,000 in Federal funds in a given fiscal year must conduct an independent audit in accordance with 2CFR§200 Subpart F – Audit Requirements. The subrecipient is responsible for providing the auditor’s report to MEMA for review.

Section 8: Match & Cost Sharing

Overview

Match and cost sharing policies meet the federal regulations governing matching and cost sharing for emergency management programs (2 CFR §200.306). These policies and procedures are for the administration of Federal award programs administered by MEMA, in conjunction with the provisions of the Office of Management and Budget applicable to grants.

8.1 Match Requirements

Match or cost sharing is required for certain federal grant programs. Matching funds are non-federal funds or services, provided by the subrecipient, to cover costs budgeted in the grant. Required match will be outlined in the federal grant guidance for Matching and Cost Sharing (2 CFR §200.306).

8.2 Types of Match

Cash Match (hard-match) includes non-federal cash spent for project related costs, according to the program guidance. Allowable cash match must only include those costs which are compliant with Cost Principles for State, Local, and Indian Tribal Governments (2 CFR §200.400 - .475), Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments (2 CFR §200.201).

In-kind Match (soft-match) includes, but is not limited to, the valuation of in-kind services. In-kind is the value of something received or provided that does not have a cost associated with it.

For example, if in-kind match (other than cash payments) is permitted, then the value of donated services could be used to comply with the match requirement. Also, third party in-kind contributions may count toward satisfying match requirements provided the subrecipient receiving the contributions expends them as allowable costs in compliance with federal requirements.

All salary expenses paid to local Emergency Management Directors through the EMPG must be matched with cash. In-kind and third-party match will not be accepted. The cash match must be reflected in a budget document furnished by the city or town and be contained in a line item or similar reference that clearly delineates the emergency management program.

Personnel receiving salary payment from the EMPG program must complete the following training programs consistent with the NIMS National Standard Curriculum Development Guide: Independent Study (IS) courses: IS-100, IS-200, IS-700, IS-800 and FEMA Professional Development Series (PDS) IS-120.a, IS-230.d, IS-235.b, IS-240.b, IS241.b, IS-242.b, and IS-242.b or Emergency Management Professionals Program (EMPP) Basic Academy: IS-230.d, E/L 101, E/L 102, E/L 103, E/L 104, and E/L 105.

Section 9: Closeout

9.1 Closeout Requirements

Subawards must be closed out by MEMA when the performance period has ended, by the Liquidation period end date (EMPG), or if the applicable administrative and work required has been completed. Subrecipients are responsible for:

a. Final Request for Reimbursement Form

The final RRF must be submitted to MEMA two (2) weeks before the end of the grant performance period or, for EMPG, on or before the Liquidation period end date as directed by MEMA in written grant guidance.

b. Closeout Report

The Closeout Report must be submitted to MEMA no later than thirty days (30) after receipt of final payment or, for EMPG, on or before the Liquidation period end date. The Close Out Report form is located on the MEMA website under each respective grant program. The report must include the federal grant balance for de-obligation, total Federal Funds received, and any funds due to MEMA.

c. Final Progress Report

The Final Progress Report Form is due within ninety (90) days of the end of the performance period or, for EMPG, within 30 days of the expiration date of the grant contract and must be signed by the subrecipient's authorized agent or delegated representative.

d. Audited Annual Financial Report

The Audited Annual Financial Report is due within ninety (90) days of the end of the performance period

Appendix A: Equipment

Overview

This Appendix includes detailed information about responsibilities and authority in the management of federally funded equipment, property management procedures, sets forth minimum requirements established by MEMA, and utilizes principles from the State of Maine Department of Administrative and Financial Services, Office of the State Controller Fixed Asset policies¹². Jurisdictions have authority to establish additional internal controls in addition to this guidebook and state policy.

Equipment is tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the subrecipient's policy or \$5,000, whichever is less.

MEMA exercises equipment control responsibility in a variety of ways, including:

- **Equipment Control Management** - MEMA maintains equipment records and conducts annual inventories, controls jurisdiction equipment transfers, and directs the disposition of any excess federally funded equipment.
- **Equipment Acquisition Inventory Reduction** - Equipment management and inventory control procedures begin when a new item is purchased. For used equipment, jurisdictions will notify FEMA of their request. If a trade-in is requested, FEMA will determine if it is in the best interest of the State before approving.
- **Equipment Transfers** - FEMA must pre-approve equipment transfers between jurisdictions once associated costs and method of transfer have been agreed upon. The equipment may not be moved until the transfer has been approved by FEMA.
- **Surplus Equipment Disposition** - Equipment must be in useful or serviceable condition. An item reported as surplus can no longer be used, repurposed, or moved without written approval from FEMA.

The Equipment Inventory form indicates the purchase of equipment with a value of \$5,000 or more by subrecipient and must be submitted to MEMA for approval.

A1.1 Equipment Control Management

All equipment purchased with federal funds must be authorized and allowable in accordance with the Authorized Equipment List¹³.

A1.2 MEMA Responsibilities

¹² <https://www.maine.gov/osc/accounting/fixed-assets>

¹³ <https://www.fema.gov/grants/guidance-tools/authorized-equipment-list>

MEMA implements the federally funded equipment control management program for certain grant programs and are charged by federal and state regulations with having full knowledge of all equipment transactions within their jurisdictions. Specific responsibilities include:

- Developing policies and procedures
- Controlling and monitoring equipment accounting files
- Providing data and technical assistance to their designated jurisdictions
- Auditing receiving reports, equipment transfers, equipment disposition and physical inventories
- Conducting field inventory audits

The Code of Regulation 2 CFR §200, Office of Management & Budget (OMB), and state regulations are the tools used by MEMA to implement its management responsibility.

A1.3 Subrecipient Responsibilities

Subrecipients help MEMA to fulfill their equipment control management responsibilities on a day today basis. The duties of a subrecipient vary depending upon the local government, but generally include:

- Initiating transactions when equipment is purchased, loaned, borrowed, or transferred
- Originating excess (disposition) equipment transactions
- Completing an annual inventory of all equipment, at the end of the grant award or, for EMPG, on or before the Liquidation period end date during the closeout process
- All equipment must be made available for inspection at the MEMA's request.

A1.4 Property Identification

A property decal should be placed where it can be easily seen. Property decal placement should be uniform, regardless of the property's location or placement. If a property decal is hidden, it is recommended to have visible identifier indicating where the property decal or tag is located. At minimum, when practicable, any equipment purchased with federal grant funding shall be prominently marked as follows: "Purchased with funds provided by the U.S. Department of Homeland Security" or applicable federal agency based on award.

A1.5 Equipment Allowability

Equipment allowability is based on the AEL, however exceptions may be considered on a case-by-case basis if:

- The equipment to be purchased is directly related to one or more of the 32 National Preparedness System Core Capabilities and
- The equipment's purpose (when operational) falls into the permitted use of funds in the 9/11 ACT

OPSG Only: Requested equipment must be approved by the Integrated Planning Team (MEMA, County, Border Patrol, and LE Partners), be included in the requested Campaign Plan/Operation Order, and subsequently approved by Border Patrol National HQ and FEMA.

A1.6 Equipment Acquisition

New Equipment

Equipment management and inventory control procedures shall begin when a new item is purchased. The Equipment Inventory Form is used by MEMA to assure that all necessary information is available for reporting. This report is submitted to MEMA as part of the close out process for each subaward. MEMA will determine if the equipment listed is a resource typed asset and will notify the subrecipient of the necessary labeling.

Used Equipment

Subrecipients will notify MEMA of their request for surplus items. Requests will be fulfilled in the order in which they are received.

Trade-Ins

Trade-ins are required to be pre-approved in writing, in advance by MEMA and FEMA. A trade-in request will be approved only when MEMA and FEMA has determined that it is in the best interests of the State. A proposed trade-in is initiated by memorandum from the jurisdiction, through MEMA, and approved by both MEMA and FEMA.

The memo must include:

1. Equipment description including serial number
2. Equipment condition and current estimated value
3. Statement of need and significant program impacts, if any, should the trade-in be denied
4. Description of new equipment desired, including proposed method of purchase, estimated purchase price, and estimated trade-in allowance

A1.7 Inventory Reduction

Lost-Stolen-Damaged

An item which is lost, stolen, damaged or destroyed must be reported by the subrecipient in writing within thirty (30) days to MEMA. MEMA retains the authority to establish the degree of responsibility and liability, as well as appropriate punitive measures for negligence or misuse of federally funded equipment by an employee or individual.

Employees and individuals should be advised of any liability they might incur due to their custody of federally funded equipment and the procedures to follow when an item is being reported as lost, stolen,

damaged, or destroyed. Suspected theft of equipment or supplies should be reported immediately to the appropriate law enforcement agency. Any law enforcement report must be included with the memorandum to MEMA.

Loaned Equipment

Equipment may be loaned to another jurisdiction for a specified period of time with notice to MEMA. An Equipment Memorandum of Agreement (MOA) must be executed and a copy given to MEMA. The MOA is the only record acceptable to an auditor for documenting the location of items not physically present at the time of an audit. If an item will be on loan for six months or more, a permanent transfer must be considered.

Equipment Transfers

Equipment may be transferred to another jurisdiction only after pre-approval by MEMA. The releasing jurisdiction and the receiving jurisdiction must agree on the method of transfer and any associated costs then the executed agreement to MEMA for approval. The equipment may not be moved until the transfer has been approved by MEMA and FEMA.

A1.8 Surplus Equipment Disposition

Equipment Re-Utilization

Equipment in useful or serviceable condition, but is deemed surplus to actual need, must be reported in writing to MEMA. Once an item is reported as surplus, it cannot be further used, repurposed or moved from its reported location without prior written approval from MEMA. Once the equipment has been deemed surplus, the following applicable actions must be taken:

- All data must be removed/deleted from systems.
- Computers, hard-drives, and tablets: All programs without accompanying licenses must be deleted prior to surplus; all official/personnel files data files must be removed; if in doubt, remove it.
- Fax machines and copiers: All headers and history files must be deleted; remove and retain paper if it is letterhead.
- Phones and answering machines (cell, satellite, and system): Cancel cell/satellite service; remove numbers from speed dial, caller I.D., etc.; delete greetings and messages from answering machines.
- Bottom line-reconfigure or erase all functions, including electronic functions, of the equipment as necessary to prevent the equipment from producing indicators that the equipment, or a product generated by the equipment, is property of the jurisdiction, federal government or state.

The reuse of surplus equipment by other jurisdictions is MEMA's highest priority. MEMA may recommend the transfer of surplus equipment directly to another jurisdiction rather than dispose of the equipment. Subrecipients are required to notate on the Equipment Inventory form if the equipment was sold. MEMA requires a copy of the Equipment Inventory form, however the subrecipient is responsible for maintaining records of the sale, estimate, and all other pertinent information for future audit and monitoring purposes.

Appendix B: Expenses

B1.1 Allowable Activities and Costs

Proposed subaward costs must be reasonable, allocable, and allowable under Federal guidelines, and consistent with the subrecipients' approved grant application. The NOFO is the primary guide for determining if a cost is allowable.

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs. Consult 2CFR §200.404 Reasonable Costs for more information.

a. Personnel

Personnel expenses are charges for individuals who are employed by the jurisdiction or organization. Personnel expenses are only allowable when listed in the NOFO and only to perform allowable planning, organization, training, equipment, and exercise activities listed in the NOFO. The subrecipient must reference the NOFO to determine whether the type of activity is allowable. Personnel costs cannot extend beyond the grant award period of performance.

Personnel paid by multiple programs may be reimbursed for one staff person where the sum of the total hours requested across the multiple programs equals the actual number of hours worked.

Overtime expenses are limited to the additional costs that result from personnel working over and above 40 hours of weekly work time as a direct result of their performance of approved activities (as specified in the applicable NOFO). Overtime associated with any other activity is not eligible. Overtime is only allowable under the limited circumstances permitted by the NOFO and must comply with the subrecipient's existing policies regarding overtime pay.

Overtime as backfill expenses are limited to overtime costs which result from personnel who are working overtime (as identified previously) to perform the duties of other personnel who are temporarily assigned to approved activities (specified in the applicable NOFO) that are outside of their core responsibilities.

Compensatory Time is not reimbursable as it cannot be easily substantiated and associated with activities in support of the grant.

b. Travel

Travel costs are allowable expenses by employees and contractors who are in travel status on official business in support of grant program activities. The subrecipient must follow its jurisdiction's or organization's established travel policy, which must generally conform to the Federal and State travel

policies. Any costs not clearly in compliance with the jurisdiction/organization's or Maine's written travel policy will be considered unallowable.

MEMA encourages subrecipients to provide a copy of their travel policy in advance of requesting reimbursement to help expedite the review and approval process. A copy of travel policies may be requested by MEMA at any time.

c. Contractual Services

Any type of service that is procured through a contract agreement is a contractual service. The subrecipient must follow its jurisdiction's or organization's procurement procedures and regulations, provided that the procurement conforms to applicable State and Federal laws and standards.

All contracts relating to or derived from the subaward must be on a competitive bid agreement. The subrecipient's own specific policy and all State and Federal regulations applicable to grants and cooperative agreements (with a record of the procedure, bids received, and rationale for the final decisions) must be maintained to assure proper procedures were followed.

Professional Services are services performed by independent contractors or consultants to assist with accomplishing project goals and objectives. The subrecipient cannot pay for professional services that extend beyond the subaward period of performance. For example, if a subaward period is two years and the contract agreement is three years, only the costs associated with the first two years of the agreement would be allowable. Examples include plan development, exercise development, project management support, advertisement, etc.

Service Agreements such as wireless services, data services, hosting services (e.g. website), and service renewals cannot extend beyond the subaward period of performance.

Maintenance/Warranty Services, contracts/licenses, and user fees coverage have an exception for exceeding the subaward period of performance only if they are purchased at the same time and on the same invoice or purchase order as the original equipment or system which the warranty/maintenance, contract/license and users fees serve to cover, and are reasonable and consistent with that which is typically provided for or available through these types of agreements. FEMA Grant Programs Directorate Policy FP 205-402-125-1¹⁴ amends the maintenance section within FEMA Information Bulletin (IB) 336¹⁵. All other portions of the IB remain in effect.

d. Organization

For more information on eligible operational costs, refer to the applicable grant NOFO. Costs charged to this grant award must be consistent with the Cost Principles for Federal Awards located at 2CFR§200, Subpart E:

¹⁴ https://www.fema.gov/sites/default/files/2020-08/fema_gpd_maintenance-policy.pdf

¹⁵ <https://www.tn.gov/content/dam/tn/tema/documents/IB336-Sustainment.pdf>

- Building and Sustaining Capabilities
- Planning to Deliver Capabilities
- Validating Capabilities

Subrecipients must be able to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR), areas for improvement identified from real-world incidents and preparedness exercises, and national areas for improvement identified in the most recent National Preparedness Report.

Subrecipients should document these priorities and use them to deploy a schedule of exercise events and supporting training activities in the Integrated Preparedness Plan (IPP). Training and exercise priorities should be documented through a schedule of exercise events and support training activities in the Integrated Preparedness Plan (IPP). The exercise program must be consistent with the HSEEP. This involves specific planning steps, scope and method of conducting the exercise, and production of an after-action report.

e. Planning, Training, and Exercise

For HSGP, allowable planning, exercise, and training-related costs must have a nexus to terrorism preparedness and must be aligned to capability gaps identified during the THIRA/SPR process.

Planning

Grant funds may be used for a range of emergency preparedness and management planning activities, including, but not limited to:

- Development, review and revision of the THIRA/SPR
- Continuity of operations plans
- Planning activities that support the strategic goal and Emergency Operation Plan (EOP) that conforms to the guidelines outlined in Comprehensive Preparedness Guide (CPG) 101 v 2.0

Training

- MEMA allowable training-related costs are those that address any training or training gaps identified through an AAR/Improvement Plan or other assessments. Subrecipients are encouraged to use existing training materials rather than developing new courses.
- OSPG cannot fund training costs with the exception of mission essential equipment initial instillation training. OSPG cannot fund exercise costs.

Exercises

All grant funded exercises must be consistent with the HSEEP, Maine Training and Exercise Plan, and meet grant specific requirements. This involves specific planning steps, scope and method of conducting the exercise, and production of an AAR. The AAR must be submitted to MEMA within

90 days of exercise completion.

f. Food and/or Beverages

Food and/or beverages are allowable if provided to participants at a training and exercise session, planning meeting, or conference and is allowable per the grant program guidelines. The food and/or beverages must be provided on site where the training and exercise session, meeting, or conference is being held. Any and all such costs must be clearly allowable under the subrecipient's own purchasing and procurement regulations.

Expenses incurred for food and/or beverages provided at training sessions, meetings, or conferences must be:

- Considered reasonable
- Incidental to a work-related event. Costs will not be reimbursed for shorter events scheduled to coincide with meals.
- Not directly related to amusement and/or social events
- No working lunches.
- Any event where alcohol is being served is considered a social event, and costs associated with that event are therefore not allowable.

Food and beverage costs are unallowable for some grants, see NOFO for specifics

g. Equipment/Supplies

The NOFO is the primary reference tool to determine allowability. For equipment and supplies costs, an AEL assigns a numeric code to pre-approved categories of equipment and supplies. Proposed equipment and supplies purchased must list the corresponding AEL code where one exists, and if it does not exist, the subrecipient must notify MEMA in order to obtain approval. Each grant program has an AEL and the subrecipient must ensure they reference the correct AEL.

h. Management and Administration

Management and Administration (M&A) costs are direct and necessary costs incurred to manage and administer a grant award. Subrecipients must reference the NOFO to determine what percentage of their subaward can be used for M&A activities. M&A must be documented just like any other allowable personnel, equipment, or supplies costs. In addition, M&A costs must be:

- Integral to the subaward
- Specifically identified within that subaward
- Explicitly included in the budget
- Easily separable for accounting and reporting purposes
- Not be recovered as indirect costs

Examples of M&A activities:

- Completing the grant award application process
- Preparing and submitting required programmatic and financial reports
- Performing financial management activities and monitoring compliance with applicable regulations and requirements
- Establishing and/or maintaining equipment inventory/usage logs
- Responding to activities such as requests for programmatic and/or financial data by state and/or Federal oversight authorities related to the grant

i. Indirect Costs

Indirect costs are costs of a jurisdiction or organization that are not readily assignable to a particular subaward but are necessary to the operation of the jurisdiction or organization, and the performance of the subaward. The cost of operating and maintaining facilities, depreciation, and administrative salaries are examples of the types of costs that are usually treated as indirect. The indirect rate agreement must be approved by the cognizant federal agency and provided to MEMA prior to seeking reimbursement.

M&A and Indirect expenditures are different and should not be confused. If a subrecipient is unsure about a particular expenditure, please contact MEMA.

j. Supplanting

Subrecipients are reminded to be sensitive to supplanting issues. Grant funds can only be used to supplement existing funds and cannot supplant (replace) funds that have been appropriated in its jurisdiction or organization's budget for the same purpose. Therefore, equipment, supplies, contractual services and personnel previously funded with state and/or local funds cannot be supplanted with Federal grant funding. The subrecipient may be required to supply documentation certifying that a reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

k. Law Enforcement Minimum (SHSP ONLY)

The Law Enforcement Terrorism Prevention Program (LETPP) allocation ensures Maine spends at least 25% of the overall SHSP grant on LETPP activities. MEMA will determine LETPP minimums for qualified subrecipients and provide it in the written allocation. Subrecipients may plan for and execute more than minimum LETPP expenses/projects, but not less.

l. Unallowable Activities and Costs

Subrecipients must reference the NOFO to determine if any costs have been specifically called out as unallowable under a particular grant program. In addition, any costs that are not listed as allowable in the NOFO or otherwise approved in writing by DHS must be considered unallowable.

Subrecipients must meet all conditions listed in 2CFR§200, the NOFO and all subaward terms and conditions prior to incurring costs against the subaward. Otherwise, those costs are considered unallowable, including:

- Construction and renovation are generally prohibited for HSGP; however, there are a few exceptions and the subrecipient must reference the NOFO for these exceptions and discuss with MEMA. EMPG does permit construction and renovations subject to an EHP and allowability of costs.
- Land acquisition costs are unallowable unless otherwise noted in the NOFO.
- Motor vehicles are unallowable unless otherwise noted in the NOFO.
- HSGP specific: Non-terrorism-related costs are unallowable. Funds may only be used to build capabilities to prevent, protect against, mitigate, respond to, and recover from acts of terrorism. A dual or secondary use of those capabilities is permitted, but if the capability has no correlation to terrorism, it is not allowable under HSGP.
- Operational costs are generally prohibited. This includes personnel expenses incurred during an activation or deployment, and any equipment or supplies procured during an emergency. There are very limited exceptions allowed for operational overtime, but only with prior approval provided in writing by the FEMA Administrator.
- Preparedness items (e.g. food, water, disaster ready kits, emergency blankets, first-aid kits) that are part of a stockpile for critical emergencies, kept in a manner consistent with a DHS/FEMA approved 5-year viable inventory management plan, may be allowable. Any other type of cache of preparedness items, and particularly any distribution or hand-out of these items to the general public outside of an emergency event is not allowable.
- Promotional materials (bags, pens/pencils, pins, patches, magnets, souvenir clothing/headwear, etc.) are unallowable. Note: Must have a preparedness tie-back to be eligible for EMPG.
- Training and exercise equipment and supplies for permanent installation and/or use beyond the scope of the conclusion of the training or exercise.
- Training and exercise costs for maintenance and/or wear and tear of general use vehicles (e.g., construction vehicles), medical supplies, and emergency response apparatus (e.g., fire trucks, ambulances).
- Travel costs considered unallowable: entertainment, sporting events, visa fees, passport charges, bar charges and/or alcoholic beverages, laundry charges, and mileage and fuel for a vehicle owned or leased by the subrecipient's organization. Any costs not clearly in compliance with the jurisdiction/organization's written travel policy, or General Services Administration (GSA) policy, if lack thereof, are considered unallowable.
- Work or services performed after the end of the period of performance, unless otherwise exempted under Maintenance/warranty services. Goods may be received during the subrecipient's liquidation period only if funds were obligated (e.g. contract or purchase order issued) during the period of performance. In those cases, consult with the appropriate MEMA program manager.
- Per FEMA policy, the purchase of weapons and weapons accessories, including ammunition, is not allowed with HSGP funds.
- Grant funds must comply with IB 426¹⁶ and may not be used for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed.
- Grant funds may not be used for the purchase of equipment not approved by DHS/FEMA.

¹⁶ https://www.fema.gov/media-library-data/1563818232178-07b033fa2f4ebf5fe934234ac8f26ab9/ControlledEquipmentRecission_IB_Final_11-1-17_Added_Alt_Text_508.pdf

m. LEPC/SERC Allowed Activities & Items

LEPC's determine the use of their funds with policy guidance and direction from the SERC and County Emergency Management Agency director. SERC funds are used to provide planning and training support for protecting communities against hazardous materials. County EMA Directors have discretionary authority for administrative use of funds, subject to guideline adopted by the SERC.

Administrative Funds provide for administration of LEPC mission-supported activities and may be used for expenses such as paper, postage, printing, legal advertising, telephone, registrations, A/V equipment, computer software/supplies, computer equipment, reference books, subscriptions, etc.

Equipment Funds must be used within Emergency Operations Centers and/or EMA offices for support of LEPC activities

Plan Development & Maintenance Funds includes items such as basic office supplies, wages for part-time or contracted planning tasks, etc.

Expenditures for items not listed will be considered on a case-by case basis and will need written documentation of how they support the LEPC planning mission.

Funds cannot supplement any other department, agency, private entity, fire departments, sheriffs' offices, HAZMAT response teams, or university operation (except for training related items).

Training

SERC allowed training is generally for the following programs:

- Operations, Operations Refresher
- Technician, Technician Refresher
- Technician Bridge Course
- Other: must be specified on SERC grant application

Training application must be coordinated with LEPCs. All training must meet National Fire Prevention Association (NFPA) 472¹⁷ training curriculum standards.

¹⁷ <https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=472>

Appendix C: Grants Monitoring

Overview

MEMA, as the federal grantee, is responsible for monitoring subrecipients and determining that all compliance and programmatic responsibilities are fulfilled in accordance with Homeland Security Grant Program Guidelines. It will ensure MEMA is providing resources and support to local and state agencies in an efficient and effective manner. Overall, MEMA will assess how resources awarded to subrecipients enhance prevention, protection, response and recovery capabilities, and support state and federal goals and objectives. MEMA relies on consistent, fair, open and reasonable reporting and accountability by subrecipients.

Monitoring of grants encompasses three main areas:

- 1) Compliance monitoring of planning, exercise and training funds, the procurement process and compliance with regulations
- 2) Programmatic monitoring of subrecipient progress and operations, including equipment deployment, for project implementation and execution
- 3) Project milestones and progress and adhering to the approved Scope of Work

Monitoring assists MEMA in identifying areas of need for subrecipient support and provides feedback on ways to improve its services. MEMA conducts subrecipient monitoring based upon, but not limited to, the following:

- 2 CFR §200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Common Rule for Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments
- Certifications and Assurances
- Grant Program Guidance
- Applicable Code of Federal Regulations
- Subrecipient Grant Award Agreement
- NIMS Compliance
- US Department of Homeland Security Financial Management Guide

Types of Monitoring

Office-Based (Desk) Monitoring

For active grant programs, MEMA will conduct office-based (desk) monitoring review and risk assessments for all subrecipients once per fiscal year. Open, multi-year subawards under the same program will be reviewed and monitored at the same time. MEMA will perform a comprehensive review

of the subrecipient grant file to ensure that all documentation is complete and current; noting any file irregularities. The review serves to evaluate progress implementation and timelines, determines the subrecipient's achievements and potential problems faced in implementing the project, and assesses the status of the Grant Progress Report Form, Equipment Inventory Form, and the rate of expenditure of funds.

Subrecipients identified by MEMA as noncompliant will be monitored on a quarterly basis by requiring additional detailed progress report review or desk monitoring, and/or a site monitoring visit. A subrecipient will be considered noncompliant if the subrecipient appears to have financial difficulties and/or grant management deficiencies. Noncompliant subrecipient quarterly status shall be reviewed with the MEMA Grant Program Manager, who will immediately advise the MEMA Executive Director of critical issues found, corrective actions, and best practices.

MEMA may contact the subrecipient to schedule a phone interview with the project manager, grant fiscal manager/coordinator, and/or other applicable individuals in relation to all active subawards. MEMA will verify if the subrecipient has conducted proper procurement (a narrative summary of the process will be required), if they are experiencing any grant management problems internally or with MEMA, or if they have identified a need for technical assistance and support from MEMA. MEMA will complete a Desk Monitoring Checklist and schedule follow-up meetings as necessary.

On-Site Monitoring

The top 3% of subrecipients with the highest risk assessment score will have an on-site monitoring visit during the that fiscal year. However, mandatory on-site monitoring visits are required for *all* subrecipients at least once every two years, regardless of risk assessment results. Subrecipients may also request on-site monitoring if they require assistance or additional guidance from MEMA.

For on-site monitoring, all active Federal Grant Programs in which the subrecipient has received an award will be reviewed and monitored. A pre-monitoring analysis of the subrecipient will be conducted by MEMA to determine which items should be reviewed during the site visit. Progress reports, financial reports, amendment requests, financial audit findings, rate of expenditures, NIMS status, reimbursement requests, Equipment Inventory forms, and any additional compliance requirements will all be reviewed as part of the pre-monitoring analysis. Any file irregularities or problems discovered will be noted.

The subrecipient will be contacted to schedule a date and time for the on-site monitoring visit at least thirty (30) days prior to the proposed on-sit monitoring visit to schedule a date and time. The initial contact will outline the items to be reviewed during the on-site visit and any preparation the subrecipient should make prior to the appointment. A confirmation letter or email detailing the agreed upon date and time, the on-site monitoring agenda, items to be reviewed, and the Monitoring Report Form will be sent to the subrecipient.

The on-site visit includes discussions about project implementation such as milestones, timeline, rate of funds expended, project operations, performance measures and evaluation, interviews with key agency members, review of documentation and equipment, and an exit interview to discuss findings and address any questions or concerns. The exit interview will review highlights and clarify any corrective action items for the subrecipient to address post-visit.

Upon completion of the on-site monitoring, MEMA will review the site visit findings and follow-up with a Post Visit letter to the subrecipient. Any findings and corrective action requirements will be included in the Post Visit letter. If any outstanding issues are identified, the Post Visit letter will specify a specified deadline for the subrecipient to submit a Corrective Action Plan identifying what steps are being taken for resolution.

Any subrecipients who are under a Corrective Action Plan will be monitored for the following two quarterly reporting cycles (six months). Any further findings during this monitoring period will result in a follow-up site visit. Subrecipients failing to take corrective measures towards compliance after the second visit will be subject to a single audit at their cost, de-obligation of funds, and ineligible for future funding.

Appendix D: Acronyms Glossary

A

AAR	After-Action Report
AEL	Authorized Equipment List

B

BRIC	Building Resilient Infrastructure and Communities
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C

CFR	Code of Federal Regulations
CPG	Comprehensive Preparedness Guide

D

DAR	Daily Activity Report
DHS	Department of Homeland Security
DUNS	Dun and Bradstreet Data Universal Numbering System

E

EHP	Environmental and Historic Preservation
EMA	Emergency Management Agency
EMPG	Emergency Management Performance Grant
EMPP	Emergency Management Professionals Program
EOC	Emergency Operations Center
EOP	Emergency Operation Plan

F

FEMA	Federal Emergency Management Administration
FFATA	Federal Funding Accountability and Transparency Act
FMA	Flood Mitigation Assistance

G

GCMF	Grant Contract Modification Form
GSA	General Services Administration

H

HHPD	Rehabilitation of High Hazard Potential Dams Grant Program
HMA	Hazard Mitigation Assistance
HMEP	Hazardous Materials Emergency Preparedness

HMGP	Hazard Mitigation Grant Program
HSEEP	Homeland Security Exercise and Evaluation Program
HSGP	Homeland Security Grant Program
HSPD-5	Homeland Security Presidential Directive 5

I

IB	Information Bulletin
IPP	Integrated Preparedness Plan
IPZ	Ingestion Pathway Zone
IS	Independent Study

L

LEPC	Local Emergency Planning Committee
LETPP	Law Enforcement Terrorism Prevention Program

M

M&A	Management and Administration
MEMA	Maine Emergency Management Agency
MOA	Memorandum of Agreement
MYTEP	Multi-Year Training and Exercise Plan

N

NFPA	National Fire Protection Association
NIMS	National Incident Management System
NOFO	Notice of Funding Opportunity
NSGP	Non-profit Security Grant Program

O

OMB	Office of Management and Budget
OSPG	Operation Stonegarden

P

PDM	Pre-Disaster Mitigation Grant
PDS	Professional Development Series
PMP	Project Management Plan

R

RRF	Reimbursement Request Form
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S

SAA	State Administrative Agency
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SAM	System for Award Management
SERC	State Emergency Response Commission
SHSP	State Homeland Security Program
SPR	Stakeholder Preparedness Review

T

T&M	Time and Materials
THIRA	Threat and Hazard Identification and Risk Assessment
THP	Technological Hazards Program

U

UASI	Urban Areas Security Initiative
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