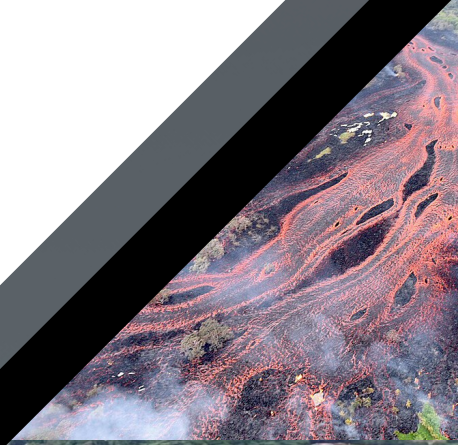




HAWAII EMERGENCY MANAGEMENT AGENCY'S
LOCAL PROGRAMMATIC GUIDANCE

EMERGENCY MANAGEMENT PERFORMANCE GRANT

FISCAL YEAR 2021



Grant Information

Issued By:

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

Assistance Listings Number and Title:

97.042 Emergency Management Performance Grant (EMPG) Program

Funding Opportunity Title:

Fiscal Year 2021 Emergency Management Performance Grant Program

Funding Opportunity Number:

EMPG - Region IX DHS-21-GPD-042-09-01

Authorizing Authority for Program:

Section 662 of the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA), as amended, (Pub. L. No. 109-295) (6 U.S.C. § 762); the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (Pub. L. No. 93-288) (42 U.S.C. §§ 5121 et seq.); the Earthquake Hazards Reduction Act of 1977, as amended (Pub. L. No. 95-124) (42 U.S.C. §§ 7701 et seq.); and the National Flood Insurance Act of 1968, as amended (Pub. L. No. 90448) (42 U.S.C. §§ 4001 et seq.).

Appropriation Authority for Program

Department of Homeland Security Appropriations Act, 2021 (Pub. L. No. 116-260)

Program Category

Preparedness: Emergency Management

Program Overview, Objectives, and Priorities:

Overview

The Fiscal Year (FY) 2021 Emergency Management Performance Grant (EMPG) program is one of the grant programs that constitute DHS/FEMA's focus on all-hazards emergency preparedness. These grant programs are part of a comprehensive set of measures authorized by Congress and implemented by DHS. Among the goals noted in the DHS Strategic Plan, the EMPG program supports the goal to Strengthen Preparedness and Resilience.

The 2018-2022 FEMA Strategic Plan creates a shared vision for the field of emergency management and sets an ambitious, yet achievable, path forward to unify and further professionalize emergency management across the country. The EMPG Program supports the goals of Building a Culture of Preparedness, Readyng the Nation for Catastrophic Disasters, and Reducing the Complexity of FEMA. We invite all stakeholders and partners to also adopt these priorities and join us in building a more prepared and resilient nation.

Objectives

Provide funds to assist state, local, tribal, and territorial emergency management agencies to implement the National Preparedness System (NPS) and to support the National Preparedness Goal (the Goal) of a secure and resilient nation. To that end, program objectives include: 1) closing capability gaps that are identified in the state or territory's most recent Stakeholder Preparedness Review (SPR); and 2) building or sustaining those capabilities that are identified as high priority through the Threat and Hazard Identification and Risk Assessment (THIRA)/SPR process and other relevant information sources (see Priorities section below). DHS/FEMA requires EMPG recipients to complete a THIRA/SPR. Additional information on the THIRA/SPR process, including other NPS tools and resources, can be found at <https://www.fema.gov/national-preparedness-system>.

Priorities

The EMPG Work Plan should involve a collaborative negotiation process through which a common set of priorities will emerge based on a combination of state/territory priorities, regional priorities, and national priorities. State/territory priorities should be primarily driven by the THIRA/SPR process, as explained in the Objectives section above. Other relevant information sources, such as: 1) after-action reports (AARs) following exercises or real-world events; 2) audit and monitoring findings; 3) Hazard Mitigation Plans; and/or 4) other deliberate planning products may also be used to inform state/territory priorities. Regional priorities will be determined by the Regional Administrator based on his/her unique preparedness and emergency management needs, including broader insight into common capability gaps across the region and potential opportunities for economies of scale to capitalize on those commonalities. Regional priorities should also be based on an analysis of THIRA/SPR data and other information sources provided by the states/territories in their area(s) of responsibility. Ideally, all EMPG funded projects, as outlined in the approved FY 2021 EMPG Work Plan, will support the priorities identified through this approach.



FY21 Emergency Management Performance Grant

FY 2021 EMPG Program is focused on all-hazards emergency preparedness. These grant programs are part of a comprehensive set of measures authorized by Congress and implemented by DHS. Among the goals noted in the DHS Strategic Plan, the EMPG Program supports the goal to Strengthen Preparedness and Resilience.

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IMPORTANT DATES

Grant Period:
FISCAL YEAR 2021
OCTOBER 1, 2020 - SEPTEMBER 30, 2023

Application Deadlines:

Application to Local Emergency Management	June 1, 2021
Application Due	August 6, 2021
Application Review	August 7-31, 2021
Anticipated Award Notification	September 15-30, 2021



Hawaii Emergency Management Agency
3949 Diamond Head Rd.
Honolulu, HI 96816

Phone: (808) 733-4300
Email: savanna.n.holloway-ledo@hawaii.gov
Web: Ready.Hawaii.gov

I. INTRODUCTION TO THE EMPG GRANT PROGRAM

WHAT YOU NEED TO KNOW

1. This is a reimbursable grant program and payments shall be made as the work is performed (Invoices are accepted on a quarterly basis).
2. Documents submitted with this grant application and during the performance period will become public documents and are subject to the Uniform Information Practices Act.
3. The FY 2021 EMPG program has a cost-share requirement. The recipient contribution can be cash (hard match) or third-party in-kind (soft match).

Eligibility Information

All applicants must be in good standing with the State and Federal government and obtain the following:

- Data Universal Numbering System (DUNS) Number
- Valid Employer Identification Number (EIN)
- System for Award Management (SAM) Registration
- Agreeing to Terms and Conditions of the Award
- Comply with the Federal Funding Accountability and Transparency Act (FFATA)

Federal Requirements

HI-EMA strongly recommends the consideration of the following federal grant requirements when developing an application:

- Program Priorities and Grant Special Conditions/Grant Assurances
- Implementation of National Preparedness Goal (NPG)
- Building and Sustaining Capabilities
- National Incident Management System (NIMS) Implementation
- Strengthening Governance Integration
- Maintain, or revise as necessary, all threats and hazards emergency operations plans (EOPs)
- Develop it's own and participate in the State's long-term training and exercise priorities that examine, validate and/or address capability targets identified through their annual THIRA and or capability gaps identified through their annual SPR.
- All EMPG funded personnel shall complete either the Independent Study courses identified in the Professional Development Series or the National Emergency Management Basic Academy delivered either by the Emergency Management Institute (EMI).
- Comply with the most recent version of the SAFECOM Guidance on Emergency Communications Grants
- Single Audit Requirement

PERIOD OF PERFORMANCE

A performance period is the period of time that your project, program, or event will start and end. Please make sure your performance period is adequate to complete the entire execution of your grant application

Start Date: July 1, 2021
End Date: December 15, 2022

ALLOWABLE/PRIORITIZED COSTS

Authorized federal policy prioritizes EMPG for use of sustainment of all hazards emergency management capability in jurisdictions with established capacity. These costs must comply with 2 CFR § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Allowable Costs are prioritized as follows:

PRIORITY #1 Personnel Expense:

Allowable costs include, but are not limited to, personnel gross salary (no overtime), and associated fringe benefits including matching expenditures. Personnel costs must be linked to achieving objectives and projects outlined within a jurisdiction's approved work plan.

PRIORITY #2 Operating Expense:

This includes costs to operate each respective emergency management program, as defined, to include but not limited to:

- a. Rent
- b. Insurance
- c. Communication capabilities, telephone and radio (non-equipment)
- d. Information Technology (IT) capabilities (non-equipment)
- e. Utilities
- f. Office supplies under \$1,000
- g. Furnishings (not including IT) under \$1,000
- h. Postage
- i. Printing
- j. Emergency Management specific professional dues and subscriptions
- k. Registration fees for meetings and Conferences with direct connectivity to Emergency Management program and capability
- l. Travel
- m. Public Education and awareness on emergency management and preparedness
- n. Development and implementation of emergency operation plans, training and exercises
- o. Maintenance Contracts and Warranty Coverage
- p. Professional contracts
- q. Supplies for training, exercise and CERT
- r. Emergency Notification systems and their annual support fees

PRIORITY #3 Equipment Costs

Allowable equipment categories for the applicable award are listed on the web-based version of the Authorized Equipment List (AEL), which is sponsored by FEMA at <https://www.fema.gov/authorized-equipment-list>

The select allowable equipment includes only equipment from the following AEL categories:

- a. Personal Protective Equipment (PPE) (Category 1)
- b. Information Technology (Category 4)
- c. Cybersecurity Enhancement Equipment (Category 5)
- d. Interoperable Communications Equipment (Category 6)
- e. Detection Equipment (Category 7)
- f. Power Equipment (Category 10)
- g. Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE) Reference Materials (Category 11)
- h. CBRNE Incident Response Vehicles (Category 12)
- i. Physical Security Enhancement Equipment (Category 14)
- j. CBRNE Logistical Support Equipment (Category 19)
- k. Other Authorized Equipment (Category 21)

Equipment must also be necessary, reasonable, and applicable to the Emergency Management Program, and must be inventoried and available for HI-EMA inspection. HI-EMA must be notified if any equipment is surplus, transferred, or sold, and any equipment with a current per unit fair market value over five-thousand dollars (\$5,000.00) must comply with federal awarding agency disposition requirements.



GRANT NO COST EXTENSIONS

will only be allowed in exceptional circumstances and must be requested in writing 90 days prior to the end of your performance period.

Training and Exercise Requirements

Validating Capabilities: Recipients should engage elected and appointed officials and other whole community stakeholders to identify long-term training and exercise priorities. Recipients must be able to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR, areas for improvement identified from real-world events and preparedness exercises, and national areas for improvement identified in the most recent National Preparedness Report.

In addition to training activities aligned to and addressed in the IPP (formally TEP), all EMPG funded personnel shall complete either the Independent Study courses identified in the Professional Development Series or the National Emergency Management Basic Academy delivered either by the Emergency Management Institute (EMI) or at a sponsored state, local, tribal, territorial, regional or other designated location. Further information on the National Emergency Management Basic Academy and the Emergency Management Professional Program can be found at: <https://training.fema.gov/empp/>. Previous versions of the IS courses meet the NIMS training requirement. A complete list of Independent Study Program Courses may be found at <http://training.fema.gov/is>. Further information on Training can be found in Appendix B. In addition to training activities aligned to and addressed in the TEP, all EMPG -funded personnel [including full- and part- time state, local, tribal and territorial (SLTT) recipients and subrecipients] shall complete the following training requirements and record proof of completion:

Professional Development Series or Basic Academy

PDS	Basic Academy
<i>Professional Development Series</i>	<i>Basic Academy Pre-requisites and Courses</i>
IS-120.a: An Introduction to Exercises	IS-100 (any version): Introduction to the Incident Command System
IS-230.d: Fundamentals of Emergency Management	IS-700 (any version): National Incident Management System (NIMS)-An Introduction
IS-235.b: Emergency Planning	IS-800 (any version): National Response Framework, An Introduction
IS-240.b: Leadership and Influence	IS-230.d: Fundamentals of Emergency Management
IS-241.b: Decision Making and Problem Solving	E/L101: Foundations of Emergency Management
IS-242.b: Effective Communication	E/L102: Science of Disasters
IS-244.b: Developing and Managing Volunteers	E/L103: Planning Emergency Operations
	E/L104: Exercise Design
	E/L105: Public Information & Warning

The EMI Basic Academy provides this foundational Emergency Management education. To ensure the professional development of the emergency management workforce, the recipients must ensure a routine capabilities assessment is accomplished and an IPP is developed and implemented.

Proof of completion of training requirements (certificates/transcripts) should be maintained by subrecipients so it can be produced when requested by HI-EMA during periodic reviews. Recipients should develop long-term training and exercise priorities that examine, validate and/or address capability targets identified through their annual THIRA and or capability gaps identified through their annual SPR. Recipients should also review and consider areas for improvement identified from real-world events and exercises, and national areas for improvement identified in the most recent National Preparedness Report when developing exercise priorities. Develop a multi-year Integrated Preparedness Plan (IPP) and/or participate in the state multi-year Integrated Preparedness Plan Workshop (IPPW).

The State conducts an annual IPP workshop, to find out further details of the next scheduled workshop, please contact the HI-EMA Exercise Branch Manager at 808-733-4300 x523 or eulalio.medina@hawaii.gov

All recipients will develop and maintain a progressive exercise program, consistent to the degree practical, utilizing Homeland Security Exercise and Evaluation Program (HSEEP) in support of the of the National Exercise Program (NEP).

Reporting:

Personnel funded by EMPG must participate in three HSEEP-compliant exercises of any type (i.e. discussion-based or operations-based) within the period of performance. Participation must be documented and submitted to HI-EMA Exercise Officer prior to final reimbursement for personnel expenditures. Confirmation of exercise participation should be reported on your agency's Quarterly Program Activity reports. Copies of the completed IPP should be mailed to the HI-EMA-EM Exercise Officer with a copy of the current year schedule to the EMPG program coordinator.

Planning Requirements

All EMPG Program recipients shall maintain, or revise as necessary, jurisdiction-wide, all threats and hazards emergency operations plans (EOPs) consistent with the CPG 101 v2, which serves as the foundation for State, local, tribal, and territory emergency planning. CPG 101 v2 can be found at:

https://www.fema.gov/sites/default/files/2020-05/CPG_101_V2_30NOV2010_FINAL_508.pdf

Recipients must update their EOP at least once every two years.

In building future EOPs, planners should anticipate the increasing complexity and decreasing predictability of the future operating environment. These efforts should actively use strategic foresight, including the multiple driving forces of change and the associated evolving strategic needs shown in FEMA's Crisis Response and Disaster Resilience 2030 Report. The Report can be found at the URL noted below.

<http://www.fema.gov/strategic-planning-analysis-division/strategic-foresight-initiative>.

In FY 2021, EMPG subrecipients are **required** to develop and maintain a Distribution Management Plan as an annex to their EOP. Grant funds should clearly support resources the subrecipients need to achieve THIRA targets and close capability gaps and address sustainment needs identified in the SPR.

Example Project Types for the development of the Distribution Management Plan should include, but are not limited to the following:

- County staging site plans
- County commodity point of distribution site plans
- Staging and Point of Distribution staffing strategies/plans
- Transportation strategies/plans
- Resource sourcing strategies/plans

Single Audit Requirements

A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted. An entity which expends more than \$750,000 in aggregate from more than one Federal award must conduct a single audit. Entities which receive only one Federal award and expend more than \$750,000 from it may elect to conduct a program-specific audit.

- Subrecipients that are not current with the Single Audit requirement may not receive a conditional or final award.
- Single audits must be completed and posted to the Federal Audit Clearinghouse by March 31 of the current period of performance
- Subrecipients must still comply with all programmatic and financial requirements, in the case compliance is met prior to the end of the period of performance.
- 4th quarter reimbursement will be held until compliance is met
- See No Cost/Time Extension section on requirements

Unallowable Costs

Grant funds may not be used for:

- Unallowable Equipment: Grant funds must comply with IB 426 and may not be used for the purchase of firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed
- Expenditures for weapons systems and ammunition
- Costs to support hiring sworn public safety officers for the purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities
- Activities and projects unrelated to the completion and implementation of the EMPG Program
- Outreach Activities/Promotional Items:
 - Examples: Personalized Items with agency logos and contact information such as: pens, USB, pen boxes, journals with debossed/embossed printing, personalized messages in journals, acrylic tumblers, grocery and/or therm-o-totes
- Expenses related to personnel who are not listed as EMPG funded personnel on the approved application (travel, memberships, conference registration, training, exercises, etc.)
- Expenses related to deployment or contracts, outside of the normal emergency management duties, with other Federal or State Incident Management Teams (FEMA), Emergency Management Assistance Compact deployments, etc.

Subrecipients should consult with HI-EMA Grant Manager prior to making any investment that does not clearly meet the allowable expense criteria established in this Manual and the EMPG Program NOFO.

II. POST AWARD

Following final award, programmatic monitoring begins. This involves oversight throughout the award lifecycle for HI-EMA to verify that programs and projects undertaken by subrecipients are consistent with approved plans and comply with applicable laws, regulations, program guidance, and the terms and conditions of the award.

A signed Memorandum of Agreement (MOA) must be returned to HI-EMA prior to any issuance of reimbursement for costs incurred.

Grant Performance Period

The performance period for the current EMPG subrecipients can be found on the grant MOA for each grant subrecipients' specific award. Note that all costs must be incurred within the period of performance to include receipt and installation of all equipment. No funds may be spent on activities or costs that occur outside of the defined grant performance period.

Amendment to Application and Workplan

Grant subrecipients must submit a formal written request and obtain the prior approval of the pass-through/awarding agency in any case where a change is to be made to the scope of the project, regardless of budget impact. HI-EMA will require all grant subrecipients to request an amendment/budget modification and approval prior to costs being incurred for the item(s) to be changed. Actions taken and any costs incurred prior to modification and approval of the application may result in costs being deemed ineligible for reimbursement. If adjustments, corrections or revisions need to be made to a work plan, please contact your Grants Manager for assistance. An amendment form is available upon request.

Amendments should be submitted for:

- Change in scope or objectives of project(s)
- Change of authorized official or key personnel
- Vacancy in personnel positions funded by the grant that exist for more than 3 months.

No Cost/Time Extension

No Cost Extension - Under certain extenuating circumstances, a subrecipient may apply for a No Cost Extension. When requesting an extension, the reasoning should include compelling legal, policy or operational challenges being experienced that prevent the final outlay of awarded funds by the

deadline outlined in the grant agreement. The letter of request should be on agency letterhead signed by the authorized representative and submitted to the HI-EMA Administrator.

Single Audit Compliance No Cost Extension - Extension are acceptable due to non-compliance with the Single Audit Requirement. The recipient should have a current eligible award and be current with programmatic and financial responsibilities. A subrecipient requesting an extension shall submit the extension request on agency letterhead signed by the authorized representative and/or the agency Finance Director with the following information:

- Fiscal Year the recipient is non-compliant
- Expected timeline for compliance
- Update of progress on audit from the State Auditor General's Office
- Additional information as needed to support the agency's claim

The subrecipient will continue to submit quarterly programmatic reports that outlines the updates and progress of the Single Audit completion.

Quarterly Reports

Following final award, programmatic monitoring begins. This involves oversight throughout the award lifecycle for HI-EMA to verify that programs and projects undertaken by subrecipients are consistent with approved plans and comply with applicable laws, regulations, program guidance, and the terms and conditions of the award.

Failure to submit the report timely will result in suspension of funds until submission of the report occurs.

Quarter	Due Date	Performance Period
1	January 10	July 1 - December 31
2	April 10	January 1 - March 30
3	July 10	April 1 - June 30
4	October 10	July 1 - September 30
Final	January 10	October 1 - December 15

Final reimbursement request is due 30 days after the end of the period of performance. All documentation to support final reimbursement request is due not later than March 30th which is 90 days after the grant performance period. Final reimbursement will be based on documentation received. Documentation received after the deadline date will not be accepted.

Quarterly Programmatic Grant Progress Reports document all grant related activities undertaken by the subrecipients during the reporting period. The quarterly reports can be e-mailed to HI-EMA Grant Manager. Subrecipients are expected to complete, and report progress of the overall set of tasks, priorities, and initiatives outlined in their approved application.

Final Quarter Programmatic Reporting

All recipients of federal funding must submit a Final Quarter Report to include a summary narrative of annual accomplishments corresponding with the respective approved fiscal year work plan.

Quarterly Reimbursement Requests

EMPG Reimbursement Requests are required to be submitted quarterly in a timely manner. If there are no expenses incurred within the quarter, both items are still required along with a cash request with a \$0 balance request. The following schedule will be adhered to by all subrecipients:

Quarter	Due Date	Performance Period
1	January 30	October 1 - December 31
2	April 30	January 1 - March 30
3	July 30	April 1 - June 30
4	October 30	July 1 - September 30
Final	January 30	October 1 - December 15

Monitoring

HI-EMA is responsible for management and oversight of the day-to-day operations of grant supported activities and is charged with monitoring grantee and subrecipient supported activities to assure compliance with applicable Federal requirements. The monitoring process is a tool that ultimately ensures a strong grant administration and management structure. HI-EMA utilizes a monitoring program that includes a desk review process and on-site monitoring visits dependent on the Risk Assessment scores which is conducted prior to the application. Desk reviews are conducted through the budget and reimbursement approval processes. The review will evaluate specific costs and fiscal/grant activities, to include programmatic achievements, within any open grant or one that has been closed within the last three years. The review may also include the inspection of equipment purchased with grant funds, review of grant files and administrative processes.

All site monitoring visits will be coordinated with the grant subrecipient with ample advance notification.

- HI-EMA will schedule visits in advance with each grant subrecipient.
- One or more HI-EMA EMPG Grant/Program and Accountant will conduct site visits.
- HI-EMA will provide a pre-site visit checklist.
- HI-EMA will provide the results with any follow-on actions/recommendations.
- HI-EMA will provide guidance to support the grant subrecipients success in all aspects of the program.
- Grant subrecipients must meet all monitoring requirements in order to maintain eligibility.

Elements for Programmatic Review may include:

- Confirmation the subrecipient's Emergency Operations Plan (EOP) has been updated within the last 2 years.
- Demonstration that the agency has established and maintains compliance with the National Incident Management System (NIMS) requirements.
- Validation that the agency participated in the development of:
 - the State's annual Threat and Hazard Identification and Risk Assessment (THIRA); Integrated Preparedness Planning (IPP) or participation in the state Integrated Preparedness Planning Workshop (IPPW).
- Validation of Training and Exercise requirements for EMPG funded personnel.
- Priorities, initiative, projects submitted in the approved application demonstrate progress and are validated and verified through documentation in the subrecipient grant folder.
- Review of an inventory list of equipment purchased with EMPG funds. Once every two years a physical inventory of the property must be taken, and the results reconciled with the property records.
- Validate Environmental Historic Preservation (EHP) documentation, if applicable.
- Ensure EMPG grant folder is maintained with all supporting documentation.
- See Pre-Site Visit Checklist for comprehensive list of review items.

Elements for Financial Review may include:

- Validate subrecipient processes and procedures meet the requirements of 2 CFR § 200, Subpart F.
- Ensure subrecipient maintains a file that includes appropriate supporting documentation.
- Confirmation the subrecipient has source documents demonstrating quarterly Time & Effort reports. EMPG requires minimum of 2 weeks per quarter for all EMPG funded personnel, regardless of percentage.
- Obtaining position description(s) from the subrecipient's Human Resource office for all positions funded by EMPG.
- Review of documentation accounting for any equipment purchased with EMPG funds.
- See Pre-Site Visit Checklist for comprehensive list of review items

For additional information, federal grant regulation monitoring rules can be found in 2 CFR § 200.328.

Closeout

HI-EMA conducts a comprehensive closeout procedure in compliance with 2 CFR § 200.343. Any issues that remain unresolved at closeout may be subject to termination or de-obligation to adhere to performance period requirements.

Final reimbursement documentation must be received no later than January 30 of the grant year. Documentation received after the deadline date will not be accepted and final reimbursement will be based on documentation received.

Audits

The grant subrecipients are accountable for the use of funds under the EMPG program. The grant subrecipients must maintain records that adequately identify the sources and application of funds provided for financially assisted activities. Actual expenditures or outlays will be compared with budgeted amounts to determine if the expenditures qualify as a reimbursable expense under the EMPG. This documentation is subject to review at any given time through the record retention period by state or federal auditors as well as FEMA or HI-EMA officials.

Availability of Public Records

Hawaii's public records law generally requires disclosure of information.

Subrecipients are encouraged to consult state and local laws and regulations and discuss these requirements with their legal counsel. Recipients should be familiar with the regulations governing protected critical infrastructure information (6 CFR § 29) and sensitive security information (49 CFR § 1520), as these designations may provide additional protection to certain classes of homeland security information.

Record Retention

Grant subrecipients are required to retain all grant-related documentation for three years after the close of the federal grant program. AZDEMA will provide notification of grant closure date along with final reimbursement for the grant. The letter will also specify retention date for grant related documentation, so the applicant maintains successful compliance.

III. PROGRAMMATIC AND FISCAL COMPLIANCE

Procurement

The procurement process is one of, if not the most, scrutinized aspect of the federal grant programs. The emphasis on how procurements are made is based from the 2 CFR § 200.318 – 200.324 requires that all procurement transactions be conducted accordingly. Additionally, grant subrecipients must ensure that they meet the procurement requirements of the State Procurement Rules and local procurement regulations. All grant subrecipients are strongly urged to seek out their procurement department/individual to seek guidance on implementing the grant requirements into the procurement of any grant funded item or service.

Grant Subrecipients will maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase order.

Grant subrecipients should note that the following situations are restrictive of competition and should be avoided:

- Placing unreasonable requirements on firms for them to qualify to do business,
- Requiring unnecessary experience and excessive bonding,
- Noncompetitive pricing practices between firms or between affiliated companies,
- Noncompetitive awards to consultants that are on retainer contracts,
- Organizational conflicts of interest,
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance of other relevant requirements of the procurement, and
- Any arbitrary action in the procurement process
- Grant subrecipients will maintain records to sufficiently detail the significant history of any procurement. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. Grant subrecipients alone will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements.

Environmental Planning and Historic Preservation (EHP) Compliance

Any equipment purchased with EMPG funds must abide by these requirements. If equipment requires modification/installation of a building to include mounting brackets on a wall or ceiling would require an EHP.

Construction and Renovation: EHP applications should be submitted to the EMPG Grant Manager by October of the grant year, to provide time for FEMA to review and process. Any type of exercise that requires any type of land, water, or vegetation disturbance or building of temporary structures must undergo and EHP review.

The FEMA EHP screening form can be found here:
https://www.fema.gov/sites/default/files/2020-07/fema_form-024-0-1_2017.pdf

Maintenance & Sustainment

Use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable under all active grant awards, unless otherwise noted. Subrecipients should explain how they will maintain and sustain equipment purchased with grant funds throughout its useful life.

Source Documentation

HI-EMA requires that accounting records be supported by source documentation such as cancelled checks, invoices, payroll reports, time and attendance records, contracts and purchase orders. HI-EMA requires that grant subrecipients have source documentation available prior to requesting reimbursement. Proper documentation for select items is as follows:

Travel costs 2 CFR § 200.474

- Copy of the government unit travel policy
- Receipts/documentation as required by travel policy justification and/or approval from government entity for overage in per diem rates, etc.
- Meeting or Conference Agenda
- Refer to the State of Hawaii Travel Policy
 - Out of State Travel
 - Hotel Invoice/receipt; Flight invoice/receipt; Shuttle receipt;
 - Meal receipts are not required, keep copies for auditing purposes.
 - In State Travel
 - Hotel invoice/receipt if overnight stay is required; Mileage: Personal vehicles – provide a printed copy of MapQuest details; Meal receipts not required, keep copies for auditing purposes.

Personnel Costs/Time and Effort documentation

- Time and effort personnel documentation for all individuals reimbursed under the award must submit a statistical sampling reports reflecting allowable work.
 - Samplings are required on a quarterly basis and must be for a two-week period unless otherwise annotated on the award letter.
 - Samplings must be signed by the employee and supervisor as certification that the report is accurate and an after the fact determination of the total activity for the reporting period being sampled.
 - Payroll Reports.
 - Documentation from an official accounting system which documents the payee, date, amount paid, and warrant or EFT number
 - Payroll records for personnel expenditures (including, Employee Related Expenditures).
 - Time & Effort reports

Professional and Contractual costs 2 CFR § 200.231, 200.326, and 200.323

- The type of service to be rendered must be described.
- Backup documentation such as bids and quotes.
- Cost price analysis on file for review by HI-EMA personnel, if applicable.
- HI-EMA requires the subrecipient to maintain the following documentation for purchases which may be requested by HI-EMA any time:
 - Specifications; Solicitations; Competitive quotes or proposals; Basis for selection decision; Contracts; Invoices; Cancelled Checks
- For individual consultants a scope of work is required and must detail the following:
 - Must describe the hourly, daily, or weekly base rate given
 - Are rates allowable, justified, reasonable, and comparable to market
 - The procurement method must be described
- Maintenance costs are allowable and must support the EMPG program accordingly.

Equipment costs 2 CFR § 200.439

- Equipment purchases must be outlined in the approved application
 - Must be verified on AEL
 - Must provide an authorized equipment list number
 - Equipment items must be specified by unit and costs
 - Procurement method must be described
 - Copy of procurement policy may be requested
 - Must explain how the equipment relates to the programmatic goals, and supports the building or sustainment of the core capabilities as outlined in the goal
 - Detailed justification in the Work Plan required and/or will be requested
- Invoice (not quotes) for equipment purchased
- Documentation that equipment is received on site and installed as necessary
 - Installation of equipment may require an EHP

Equipment must also be necessary, reasonable and applicable to EMPG, and must be inventoried and available for HI-EMA inspection. HI-EMA must be notified if any equipment is surplus and any equipment with a current per unit fair market value over five-thousand dollars (\$5,000) must comply with federal awarding agency disposition requirements.

Supply Costs

- Supplies should be listed separately
- Invoices (not quotes)
- Copy of purchase order
- Proof of payment such as a copy of a warrant or EFT/ACH payment.
- Credit or purchasing card statements are not acceptable proof of payment

Cost Sharing or Matching

- Costs are verifiable from the non-federal entity's records
- Costs are not included as contributions for any other Federal award
- Costs are necessary and reasonable for accomplishment of project or program objectives;
- Costs are allowable under Subpart E Cost Principles
- Costs are not paid by the Federal Government under another Federal award

Training and Exercise Expenses

- Agenda to include description of event and date
- Duration of event
- Location
- Number of Participants
- Signed Attendance Roster

IV. APPEALS, REMEDIES FOR NONCOMPLIANCE, TERMINATION

Appeals

The subrecipients may appeal EMPG funding eligibility determinations made by the HI-EMA Administrator within 30 days of receipt of the decision. Those appeals must be received in writing and submitted to the Administrator of HI-EMA. The appeal must include substantial documentation and reasoning to support the appeal that had not been previously submitted. The Administrator will have 60 days in which to review the appeal and supporting materials and will provide written notification to the jurisdiction.

Remedies for Noncompliance

In accordance with 2 CFR § 200.338, if a non-Federal entity fails to comply with Federal statutes, regulations or the terms and conditions of a Federal award, the Federal awarding agency or pass-through entity may impose additional conditions, as described in 2CFR § 200.207 Specific conditions. If the Federal awarding agency or pass-through entity determines that noncompliance cannot be remedied by imposing additional conditions, the Federal awarding agency or pass-through entity may take one or more of the following actions, as appropriate in the circumstances:

- Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or passthrough entity.

- Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- Wholly or partly suspend or terminate the Federal award.
- Initiate suspension or debarment proceedings as authorized under 2 CFR § 180 and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).
- Withhold further Federal awards for the project or program.
- Take other remedies that may be legally available. HI-EMA, in taking any enforcement action, will provide the grant subrecipients an opportunity for an appeal or other administrative proceeding to which the grant subrecipients are entitled.

Termination

In accordance with 2 CFR § 200.339, any award under the EMPG program may be terminated due to non-compliance. Before suspending or terminating funding, HI-EMA will provide the grant subrecipients reasonable notice of its intent to impose any measure and will make efforts to resolve the problem informally.

STATE AND REGIONAL PRIORITY MATRIX

STATE	STATE THIRA/SPR PRIORITY CAPABILITY GAPS	STATE HMP PRIORITIES	JOINT STATE/REGION AHP TASK FORCE PRIORITIES
HI	<ul style="list-style-type: none"> • Critical Transportation: Clear critical roads • Infrastructure Systems: Community power / Power restoration • Infrastructure Systems: Port restoration • Mass Care: Provide food, water, and shelter to survivors 	<ul style="list-style-type: none"> • Community Resilience: Catalyze community partnerships to promote sustained and equitable investments in risk reduction • Risk and Disaster Resilience Assessment: Position individuals and communities to understand their risk and take well-informed actions that protect community lifelines • Community Resilience: Drive resilient community resiliency through effective post-disaster program delivery 	<p>High Priority:</p> <ul style="list-style-type: none"> • Housing • Mass Care, Feeding, and Sheltering • Debris Removal • Power Restoration • Port Restoration <p>Other Relevant Task Forces:</p> <ul style="list-style-type: none"> • Temporary Power • Critical Facilities • Health and Medical • Science (Mitigation)
	SHARED PRIORITIES WITH OTHER STATES AND TERRITORIES		
	<ul style="list-style-type: none"> • Debris Removal (AZ) • Critical Transportation: Clear critical roads (AZ) • Housing (CA) 	<ul style="list-style-type: none"> • Infrastructure Systems: Community power / Power restoration (AS) • Mass Care, Feeding, and Sheltering (CA, GU, NV) 	<ul style="list-style-type: none"> • Risk and Disaster Resilience Assessment (All) • Community Resilience (All)