



AZDEMA EMPG

Programmatic Guidance

Emergency Management Performance Grant

EMPG Fiscal Year 2021



Catalog of Federal Domestic Assistance (CFDA) Number: 97.042

CFDA Title: Emergency Management Performance Grant (EMPG) Program Federal Funding Objectives:

The purpose of EMPG is to provide federal funds to states to assist state, local, territorial, and tribal governments in preparing for all hazards, as authorized by Section 662 of the Post-Katrina Emergency Management Reform Act (6 U.S.C. § 762) and the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5121 et seq.). Title VI of the Stafford Act authorizes DHS/FEMA to make grants for the purpose of providing a system of emergency preparedness for the protection of life and property in the United States from all hazards and to vest responsibility for emergency preparedness jointly in the Federal Government, states, and their political subdivisions. The Federal Government, through EMPG, provides direction, coordination, and guidance, and provides necessary assistance, as authorized in this title, to support a comprehensive all-hazards emergency preparedness system. The FY 2021 EMPG will provide federal funds to assist state, local, tribal, and territorial emergency management agencies to obtain the resources required to support implementation of the National Preparedness System and the National Preparedness Goal (the Goal) of a secure and resilient Nation.

Foreword

Emergency Managers,

EMPG funding is provided by the Federal Government to assist state, local, tribal, and territorial emergency management agencies throughout Arizona in implementing the National Preparedness System within the state.

To this end, EMPG requires recipients and sub-recipients to prioritize grant funding for projects that support closing capability gaps or sustaining capabilities identified in the Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) process and other relevant information sources, such as: 1) after-action reports following exercises or real-world events; 2) audit and monitoring findings; 3) Hazard Mitigation Plans (HMPs); and/or 4) other deliberate planning products.

In Arizona, the THIRA/SPR process and the four elements above provide the basis for the assessment of current emergency management related core capabilities on a statewide level, and therefore is the foundation for building the EMPG programmatic strategy at both the state and local (including county) levels throughout the state.

To inform the focus of these programmatic strategies at all levels within Arizona, the state works with the FEMA Regional Administrator, or designated regional program staff, to review the results of a comprehensive statewide assessment using the THIRA/SPR process and submit a state-level EMPG Work Plan that effectively addresses mutually agreed upon state and regional priorities. These priorities are used to develop specific and tailored statewide objectives within the core capability areas that can be measured to build or sustain progressive improvement over current and successive periods of performance.

These objectives, in turn, drive preparedness activity statewide through the Integrated Preparedness Plan (IPP) process, which directs EMPG-funded planning, training, and exercise activities on advancing three to five of the mutually agreed upon state and regional priorities and will set at least one performance goal for each priority area that achieves a specific outcome. Each goal will be specific, measurable, achievable within the period of performance, relevant to the priority area, and have a target date for completion.

This approach does not preclude the state recipient or sub-recipients from continuing to fund salaries and benefits with the EMPG grant, but the work plan(s) should clearly indicate the extent to which those staff are engaged in planning, training, and exercise activities that close capability gaps. It also does not preclude recipients and sub-recipients from funding projects to sustain existing capabilities. However, the intent is that funding recipients at all levels will not exclusively invest in sustainment but will also build capability in the three to five priority areas to close or reduce capability gaps.

As we move forward together, please join me in sharing a new standard in professionalism and collaboration for the implementation of the EMPG program. I look forward to our continued partnership and witnessing what we can all build together with this important funding.

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Acronyms

AEL	Authorized Equipment List
AZDEMA	The Arizona Department of Emergency & Military Affairs AZDEMA-EM
ADEMA-EM	AZDEMA's Division of Emergency Management
AZDOHS	The Arizona Department of Homeland Security
CBRNE	Chemical, Biological, Radiological, Nuclear, and Explosive materials
CERT	Community Emergency Response Team
CFDA	Catalog of Federal Domestic Assistance
CFR	Code of Federal Regulations
CPG	Comprehensive Preparedness Guide
DHS/FEMA	U.S. Dept of Homeland Security's Federal Emergency Management Agency
EFT/ACH	Electronic Funds Transfer / Automated Clearing House
EHP	Environmental Historic Preservation
EMAC	Emergency Management Assistance Compact
EMI	Emergency Management Institute
EMPG	Emergency Management Performance Grant
EMPP	Emergency Management Professionals Program
EOP	Emergency Operations Plan
HSEEP	Homeland Security Exercise and Evaluation Program
IB	Information Bulletin
IPP	Integrated Preparedness Plan
IPPW	Integrated Preparedness Planning Workshop
IS	Independent Study
IT	Information Technology
NEP	National Exercise Program
NIMS	National Incident Management System
NOFO	Notice of Funding Opportunity
NPG	National Preparedness Goal
NPS	National Preparedness System
PGAO	Programmatic Grant Activities Outline report
PO	Purchase Order
SAAM	State of Arizona Accounting Manual
SLTT	State, Local, Tribal and Territorial
SPR	State Preparedness Review
THIRA	Threat and Hazard Identification and Risk Assessment
URT	Unified Reporting Tool
USC	The Code of Laws of the United States of America

State Requirements – Intent and Scope

Definitions

Emergency Management Capability – A jurisdiction’s ability to provide all hazards incident support and coordination, in accordance with emergency management program requirements.

Emergency Management Capacity – A jurisdiction’s ability to develop resources and tools necessary to prepare for response and recovery before a disaster and manage and implement response and recovery post-disaster.

Emergency Management Program – A jurisdiction’s ability to meet all requirements as defined in 2 CFR § 200, Part E, the Notice of Funding Opportunity (NOFO), FEMA Preparedness Grants Manual, Arizona

Division of Emergency Management Local Programmatic Guidance, subrecipient agreement and application.

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, 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.

Priorities for Use of Funds:

- 1. Personnel**
- 2. Operating**
- 3. Equipment**

PRIORITY #2. Operating Expense:

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

- Rent
- Insurance
- Communication capabilities, telephone and radio (non-equipment)
- Information technology (IT) capabilities (non-equipment)
- Utilities
- Office supplies under \$1,000
- Furnishings (not including IT) under \$1,000
- Postage
- Printing
- Emergency management specific professional dues and subscriptions
- Registration fees for meetings and conferences with direct connectivity to emergency

management program and capability

- l) Automobile fuel, repair and maintenance expenses for vehicles used in the daily operations of an EM program
- m) Travel, limited to:
 - o Automobile mileage
 - o Airfare
 - o Rental vehicles
 - o Lodging
 - o Meals & incidentals
- n) Public education and awareness on emergency management and preparedness
- o) Development and implementation of emergency operation plans, training, and exercises
- p) Construction and renovation
- q) Maintenance contracts and warranty coverage
- r) Professional contracts
- s) Supplies for training, exercise and CERT
- t) Emergency notification systems and their annual support fees
- u) Food for training events that meet State of Arizona Accounting Manual definition and criteria as defined in Topic 80, Section 12

Funds provided from the EMPG shall only be used to improve and/or sustain emergency management capability and capacity throughout Arizona.

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 in Arizona includes only equipment from the following AEL categories:

- a) Information Technology (Category 4)
- b) Cyber-Security Enhancement Equipment (Category 5)
- c) Interoperable Communications Equipment (Category 6)
- d) Power Equipment (Category 10)
- e) CBRNE Reference Materials (Category 11)
- f) CBRNE Incident Response Vehicles (Category 12)
- g) Physical Security Enhancement Equipment (Category 14)
- h) CBRNE Logistical Support Equipment (Category 19)
- i) 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 AZDEMA inspection. AZDEMA must be notified if any equipment is surplus, transferred, or sold, and any equipment with a current per

unit fair market value over \$5,000.00 must comply with federal awarding agency disposition requirements.

Unallowable/Ineligible Costs

The list below gives examples of the types of items that are **ineligible**.

1. Weapons
2. Ammunition
3. Food (for meetings and events)
4. Beverage (for meetings and events)
5. Clothing, uniforms or uniform peripherals like badges or emblems
6. Challenge coins and agency logo bearing items
7. The hiring of sworn public safety officers for the purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities
8. Activities and projects unrelated to the completion and implementation of an Emergency Management Program.
9. Outreach Activities/Promotional Items:
 - a. 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, sunscreen, chap-stick, hand sanitizer, candy, gum, notebooks, pocket coolies, grocery and/or therm-o-totes
10. Expenses related to personnel who are not listed as EMPG funded personnel on the approved application (travel, memberships, conference registration, training, exercises, etc.)
11. Expenses related to deployment or contracts, outside of the normal emergency management duties, with other federal or State Incident Management Teams (FEMA, US Forest/DFFM), Emergency Management Assistance Compact deployments, DEMA-EM Instructor Cadre, etc.

Grant Performance Period FFY-2021

Period of Performance Start Date: July 1, 2021 and ending June 30, 2022

Federal Requirements

AZDEMA strongly recommends the consideration of the following federal grant requirements when developing an application.

Program Priorities and Grant Special Conditions/Grant Assurances

The EMPG Program's allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas described in the Goal. Jurisdictions receiving EMPG Program funds are required to work towards the completion of all tasks identified and submitted in the 2021 EMPG Application. In addition, all participants are required to submit quarterly Programmatic Grant Activities Outline (PGAO) reports and financial expenditure reports. The programmatic reports outline grant activities that describe achievements toward the quarterly goals identified in the approved Work Plan. Quarterly finance reports are

required to provide detailed financial accounting of program expenditures. Failure to comply with EMPG Program requirements may result in reduction of annual funding and possible reduction in the current fiscal year's award allocation. Ensuring plans are reviewed and up to date, providing and completing ongoing training courses and active participation in exercises are integral components of an effective emergency management program.

National Preparedness Goal (NPG)

The National Preparedness Goal is a secure and resilient nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.

Alignment of EMPG to the National Preparedness System (NPS)

The FY 2021 EMPG contributes to the implementation of the NPS by supporting the building, sustainment, and delivery of core capabilities. Core capabilities are essential for the execution of critical tasks for each of the five mission areas outlined in the Goal. The EMPG's allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas described in the Goal. DHS/FEMA requires recipients to prioritize grant funding to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process.

Emphasis is placed on capabilities that address the greatest risks to the security and resilience of the United States and the greatest risks along the nation's borders. When applicable, funding should support deployable assets that can be used anywhere in the nation through automatic assistance and mutual aid agreements, including, but not limited to, the Emergency Management Assistance Compact (EMAC).

The FY 2021 EMPG supports investments that improve the ability of jurisdictions nationwide to:

- Prevention: Prevent, avoid, or stop an imminent, threatened, or actual act of terrorism.
- Protection: Protect our citizens, residents, visitors, and assets against the greatest threats and hazards in a manner that allows our interests, aspirations, and way of life to thrive.
- Mitigation: Reduce the loss of life and property by lessening the impact of future disasters.
- Response: Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of a catastrophic incident; and/or
- Recovery: Recovery through a focus on the timely restoration, strengthening, and revitalization of infrastructure, housing, and a sustainable economy, as well as the health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident.

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

Alignment of the EMPG Program to the National Preparedness System

The EMPG Program contributes to the implantation of the NPS by supporting the building, sustaining and delivery of core capabilities. Core capabilities are essential for the execution of the critical tasks for each of the five mission areas outlined in the Goal. The EMPG Program's allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas described in the Goal.

Subrecipients should prioritize grant funding to demonstrate how EMPG Program funded

investments support closing the capability gaps or sustaining capabilities identified in the THIRA/SPR process and other relevant information sources, such as: 1) after action reports (AARs) following exercises or real-world events; 2) audit and monitoring findings; 3) hazard mitigation plans; and/or 4) other deliberate planning products.

FEMA Regional Administrators have identified regional priorities based on their unique knowledge of the region’s preparedness and emergency management needs. Ideally, all EMPG Program-funded projects, as outlined in the approved FY 2021 EMPG Program Work Plan, will support the priorities identified through this collaborative approach.

FEMA Region IX has analyzed the most recent THIRA/SPR and hazard mitigation plan to identify priorities highlighted by Arizona that are also important to FEMA Region IX. These are included in the State Priority Matrix along with priorities based on joint state-regional planning efforts, specifically capabilities corresponding to the joint task forces being established as part of the All-Hazards Plan update. The matrix also includes recommended priorities Arizona has in common with other Region IX states and territories, to highlight potential opportunities for additional cross-jurisdictional collaboration.

State THIRA/SPR Priority Capability Gaps	State HMP Priorities	Joint State/Region AHP Task Force Priorities	
<ul style="list-style-type: none"> On-Scene Security, Protection, and Law Enforcement Mass Search and Rescue Operations Critical Transportation: Clear critical roads Public Health, Healthcare and Emergency Medical Services 	<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><u>High Priority:</u></p> <ul style="list-style-type: none"> Safety and Security (Including Firefighting and Search and Rescue) Debris Removal Health and Medical <p><u>Other Relevant Task Forces:</u></p> <ul style="list-style-type: none"> Housing Power Restoration Temporary Power Critical Facilities Mass Care, Feeding, and Sheltering Science (Mitigation) 	
Shared Priorities with Other States and Territories			
<ul style="list-style-type: none"> Safety & Security (AS, NV) On-Scene Security, Protection, & LE (AS, NV) 	<ul style="list-style-type: none"> Debris Removal (HI) Critical Transportation: Clear critical roads (HI) 	<ul style="list-style-type: none"> Health & Medical (GU, CNMI) Public Health, Healthcare & Emergency Medical Services (GU) 	<ul style="list-style-type: none"> Community Resilience (All) Risk & Disaster Resilience Assessment (All)

Reporting on the Implementation of the National Preparedness System (NPS)

Identifying and Assessing Risk and Estimating Capability Requirements

By December 31, 2021, recipients are required to complete a THIRA/SPR that addresses all 32 core capabilities and is compliant with Comprehensive Preparedness Guide (CPG) 201, Third Edition. Specific guidance on the requirements for each core capability will be forthcoming in

2021, as some core capabilities have fewer reporting requirements than others. Building on the requirement implemented in 2020, recipients must respond to a series of planning-related questions as part of the THIRA/SPR process.

Recipients are required to submit a THIRA every three years to establish a consistent baseline for assessment. Although the THIRA will be only required every three years, recipients will continue to be required to submit an SPR annually. For additional guidance on the THIRA/SPR, please refer to CPG 201, Third Edition.

- Grant subrecipients are required to participate in the development of the state’s annual THIRA. Tribal partners can choose to independently develop and submit a THIRA directly to DHS/FEMA by December 31, 2021.
- The THIRA Workshop is conducted in partnership with the Arizona Department of Homeland Security (AZDOHS)

Building and Sustaining Capabilities

EMPG projects should describe how the proposed investment supports closing capability gaps or sustaining capabilities identified in the THIRA/SPR process.

Reporting: Recipients will be required to: (1) describe how expenditures support maintenance and sustainment of Goal core capabilities, and (2) describe how expenditures support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process and report these within the quarterly performance progress reports.

In developing applications for the FY 2021 EMPG program, recipients should consider funding projects that address areas for improvement as they relate to emergency management capabilities, including:

- Logistics – Distribution Management Planning;
- Evacuation Plan/Annex;
- Disaster Financial Management;
- Catastrophic Disaster Housing; and
- Resilient Communications.

In addition, EMPG recipients should consider funding projects that fall into the following national priority areas:

- Emerging Threats, including Cybersecurity
- Lifelines
- Safety and Security
- Food, Water, Sheltering
- Health and Medical
- Energy
- Communications
- Transportation
- Hazardous Materials

NIMS Implementation

EMPG Program subrecipients are required to implement NIMS. EMPG Program funds may be used to meet the requirements described in the NIMS Implementation Objectives for local, state, tribal and territorial jurisdictions (https://www.fema.gov/sites/default/files/2020-07/fema_nims_implementation-objectives-20180530.pdf) This document should be used as a guide for both identifying NIMS implementation objectives and needs and as a tool for evaluating NIMS compliance. NIMS guides all levels of government, nongovernmental organizations (NGO), and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the NPS. EMPG Program recipients must use standardized resource management concepts for resource typing, credentialing, and an inventory to facilitate the effective identification, dispatch, deployment, tracking, and recovery of resources.

Strengthening Governance Integration

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

- **Coordination of Investments:** Resources must be allocated to address the most critical capability needs as identified in the SPR and coordinated among affected preparedness stakeholders.
- **Transparency:** Stakeholders must be provided visibility on how preparedness grant funds are allocated and distributed, and for what purpose.
- **Substantive Local Involvement:** The tools and processes that are used to inform the critical priorities, which DHS/FEMA grants support, must include local government representatives. At the state and regional levels, local risk assessments must be included in the overarching analysis to ensure that all threats and hazards are accounted for.
- **Accountability:** DHS/FEMA recognizes that unique preparedness gaps exist at the local level. Grantees are responsible for ensuring the effective use of funds to address those gaps and for maintaining and sustaining existing capabilities.
- **Support of Regional Coordination:** Inter/intra-state partnerships and dependencies at the state and regional levels, including those within metropolitan areas, must be recognized.

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/2020-07/developing-maintaining-emergency-operations-plans.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-spa-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/tribal/local staging site plans
- County/tribal/local commodity point of distribution site plans
- Staging and Point of Distribution staffing strategies/plans
- Transportation strategies/plans
- Resource sourcing strategies/plans

Training and Exercise Requirements

Validating Capabilities through Exercises

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.

Recipients should use the same shared set of priorities in both their IPP and EMPG Program Work Plan, so that EMPG Program investments and projects help recipients implement the planning, training, and exercise activities in their IPPs and advance their IPP priorities. To this end, recipients should develop their IPPs and EMPG Program Work Plans together to create a planned, organized, and methodical approach for closing capability gaps over multiple years. This will help ensure that priorities for both the IPP and EMPG Program Work Plan are based on closing capability gaps documented in their THIRA/SPR and other relevant sources of information.

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 IPP and/or participate in the state IPPWs.

- The state conducts an annual IPP workshop, to find out further details of the next scheduled workshop, please contact the AZDEMA Exercise Branch Manager at 602- 464-6514 or Exercises@azdema.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 AZDEMA 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 AZDEMA Exercise Branch Manager with a copy of the current year schedule to the EMPG Program Coordinator.

In addition to training activities aligned to and addressed in the IPP, all EMPG funded personnel shall complete either the Independent Study courses identified in the Professional Development Series (PDS) 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 Basic Academy and the Emergency Management Professional Program (EMPP) 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 <https://training.fema.gov/>. Further information on Training can be found in Appendix B. In addition to training activities aligned to and addressed in the IPP, 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:

- *NIMS Training, Independent Study (IS)-100 (any version), IS-200 (any version), IS-700 (any version), and IS- 800 (any version), AND
- PDS <https://training.fema.gov/is/searchis.aspx?search=pds%20>
- OR the EMPP Basic Academy (<https://training.fema.gov/empp/basic.aspx>)

*Note: NIMS training courses IS-100, IS-200, IS-700, and IS-800 need to be taken only once to fulfill requirements.

Proof of completion of training requirements (certificates/transcripts) should be maintained by subrecipients so it can be produced when requested by AZDEMA during periodic reviews.

Reporting:

- All EMPG Program funded training activities must be captured in the approved EMPG Program Work Plan and should be included in the IPP.
- Subrecipients must maintain proof of completion of training requirements.

SAFECOM Guidance

Recipients (including subrecipients) who receive awards under EMPG that wholly or partially provide funding for emergency communication projects and related activities must comply with the most recent version of the SAFECOM Guidance on Emergency Communications Grants (<https://www.cisa.gov/safecom/funding>). This guidance provides recommendations to recipients regarding interoperable emergency communications projects, including allowable costs, eligible activities, grants management best practices for emergency communications grants, and information on technical standards that ensure greater interoperability. The guidance is intended to ensure that federally funded investments are compatible, interoperable, and support the national goals and objectives for improving emergency communications nationwide. Recipients

(including subrecipients) investing in broadband-related investments should review IB 386, Clarification on Use of DHS/FEMA Public Safety Grant Funds for Broadband-Related Expenditures and Investments and consult their FEMA Regional Program Analyst on such investments before developing applications.

A jurisdiction may request no more than two formal amendments in writing before March 1st or 90 days prior to the end of the period of performance.

Single Audit Requirement

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.

Post Award

Following final award, programmatic monitoring begins. This involves oversight throughout the award lifecycle for AZDEMA 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.

Grant Performance Period

The performance period for the current EMPG subgrants can be found on the grant agreement 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.

Issuance of Subrecipient Agreement

Upon final review and approval of the subrecipient application, a grant agreement will be generated and sent to the subrecipient along with any special conditions. When the agreement has been signed and returned, the agreement will be signed and dated by the AZDEMA Emergency Management Director and a fully executed copy will be forwarded to the subrecipients for their records. Receipt of the agreement conveys authorization for the subrecipient to initiate their project(s) as identified in the approved application. A fully signed and executed agreement must be on file with AZDEMA prior to any issuance of reimbursement for eligible costs incurred.

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. AZDEMA 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 Specialist for assistance. An amendment form is available upon request. Amendments/budget modifications are processed through the AZDEMA Grant Administration Office.

Conditional Awards - Once the Application has been submitted and a Conditional Award Letter has been sent to the subrecipient, changes cannot be made to the application until a final award letter has been received.

After final award, a jurisdiction may request no more than two formal amendments in writing to AZDEMA before March 1st of the following calendar year or 90 days prior to the end of the respective period of performance.

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 three months.

Quarterly Reporting Requirements

In accordance with pass-through requirements, AZDEMA is required to track quarterly progress of the grant. Grant recipients will be monitored periodically by AZDEMA both programmatically and financially, to ensure that the project goals, objectives, timelines, budgets [as stated by the applicant/recipient and approved by AZDEMA] and other related grant program criteria are being met. The priorities, initiatives, and other projects outlined and submitted within the application are the mechanism that allows this tracking. **As such, regardless of whether the recipient is requesting quarterly reimbursement and providing financial reports and supporting documentation, submission of Programmatic Grant Activity Outline (PGAO) updates to indicate what progress has been made during each quarter is required.** This process shall be repeated throughout the period of performance.

Programmatic and financial reports are required for each reporting period. Due dates are:

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

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 September 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 Activities Outline (PGAO) Reports document all grant related activities undertaken by the jurisdiction during the reporting period. The quarterly programmatic reports can be e-mailed to the AZDEMA EMPG Program Coordinator. Jurisdictions are expected

to complete, and report progress of the overall set of tasks, priorities, and initiatives outlined in their approved application during each quarter of the fiscal year.

Each quarter that shows progress towards completion of recipient stated and AZDEMA approved grant funded activities must be documented with new information in a quarterly PGO report. Failure to update programmatic grant activities outline report for each quarter will result in delayed reimbursement. Additionally, lack of progressive progress could result in de-obligation of funds. Any de-obligated funds will be reprogrammed by the state to projects that can be completed within the period of performance. If a “supplemental” funding opportunity becomes available, only grant subrecipients that have met the quarterly requirements will be notified and eligible to apply.

A Quarterly Financial Expenditure Reports document requests for reimbursement and all grant related expenditures. Quarterly financial reports must be mailed to the AZDEMA EMPG Finance Coordinator and contain original signatures. Please mail them to allow for time to arrive by the due date as indicated above. If financial reports cannot be submitted by the due date, please make notification to AZDEMA via email, and include circumstance which have prevented the report to submitted on time.

The subrecipient has 14 days from the date contacted by AZDEMA regarding missing documentation, or clarification of documentation. If no action is taken by the subrecipient to remedy the missing or clarification of documents, AZDEMA will move forward with the reimbursement request as is. If documentation is submitted after the date due, AZDEMA will, at their discretion, add the amount eligible for reimbursement to either the next quarter’s reimbursement, or the final reimbursement at the end of the period of performance.

Final Quarter Programmatic Reporting

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

Monitoring

AZDEMA 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. AZDEMA utilizes a monitoring program that includes a desk review process and on-site monitoring visits. 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.

- AZDEMA will schedule visits in advance with each grant subrecipient.
- One or more AZDEMA EMPG Grant/Program and Fiscal Staff will conduct site visits.
- AZDEMA will provide a pre-site visit checklist.
- AZDEMA will provide the results with any follow-on actions/recommendations.
- AZDEMA will provide guidance to support the grant subrecipients success in all aspects of the program.

- Grant subrecipients must meet all monitoring requirements to maintain eligibility.

Elements for Programmatic Review may include (see APPENDIX A):

- Confirmation the subrecipient's EOP has been updated within the last two years.
- Demonstration that the agency has established and maintains compliance with the NIMS requirements.
- Validation that the agency participated in the development of:
 - The state's annual THIRA and/or developed a tribal THIRA; a multi-year Integrated Preparedness Plan (IPP) or participation in the state multi-year Integrated Preparedness Plan 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 two 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.

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 Period of Performance deadline outlined in the grant agreement. The letter of request should be on agency letterhead signed by the authorized representative and submitted to the AZDEMA- EM Director.

Single Audit Compliance No Cost Extension - Extension are acceptable due to non-compliance with the Single Audit Requirement. The applicant 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 applicant 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. A Single Audit Compliance No Cost Extension does not extend the Period of Performance.

Request for extensions are due no later than May 1st of the current grant year.

Closeout/Audit Closeout

AZDEMA 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 September 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 AZDEMA officials.

Availability of Public Records

Arizona'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.

Special Consideration Elements for Programmatic and Fiscal Grant Compliance

Programmatic Compliance

Travel

Travel is eligible for meetings, conferences, training, and exercises. Reimbursements require complete documentation.

Prior approval is required for international travel. Subrecipients must submit a narrative in the application as to why international travel is needed.

Contractual Services

Professional & Consultant Services, Projects that entail more than one task, i.e., different plan revisions, should be identified as separate projects. Contracts that are to be worked in phases must include the details on all documentation (contracts, purchase orders, invoices, etc.) such as the scope for each phase, start & end dates, cost or price, and other documentation as needed.

Indirect Costs

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

Supplies

As defined as tangible personal property other than "equipment" as used in this guidance have a disposition requirement when the residual value of the combined unused inventory exceeds \$5,000. In cases where this may occur, the awarding agency is entitled to its share of the value of the remaining inventory.

Equipment 2 CFR § 200.313 and Supplies 2 CFR § 200.314

Utilization of EMPG funds for equipment purchases requires that grant subrecipients maintain specific documentation on each item through its useful life until final disposition occurs. Procedures for managing equipment (including replacement equipment), whether acquired in whole, or in part, with grant funds, until disposition takes place will, at a minimum, meet the following requirements:

- Property records must be maintained that include:
 - A description of the property,
 - A serial number or other identification number,
 - The source of property,
 - Who holds title,
 - The acquisition date, and cost of the property,
 - Percentage of federal participation in the cost of the property,
 - The location, use, and condition of the property, and
 - Any ultimate disposition data including the date of disposal and sale price of the property.
- A physical inventory of the property must be taken, and the results reconciled with the property records at least once every two years.
- A control system must be developed to ensure adequate safeguards to prevent loss,

damage, or theft of the property. Any loss, damage, or theft shall be investigated.

- Adequate maintenance procedures must be developed to keep the property in good condition.
- If the grant subrecipients is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.
- Vehicle logs documenting day-to-day activities may be required for EMPG funded vehicles. This will be determined on a case-by-case basis and will be outlined in the conditional award letter if applicable.

When the equipment is no longer needed for the original project and/or has outlasted its useful life, 2 CFR § 200.313 prescribes the following requirements for final disposition:

- Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold, or otherwise disposed of with no further obligation to the awarding agency.
- Items of equipment with a current per unit fair market value more than \$5,000 may be retained or sold and the awarding agency (FEMA through AZDEMA) shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.
- In cases where a recipient or grant subrecipients fails to take appropriate disposition actions, the awarding agency may direct the recipient or grant subrecipients to take excess and disposition actions.

Equipment - Environmental/Historical Preservation (EHP)

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 Program Coordinator 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.

Procurement Process

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 Arizona Procurement Code 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.

Maintenance and Sustainment

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

Fiscal Compliance

Source Documentation

AZDEMA requires that accounting records be supported by source documentation such as cancelled checks, invoices, payroll reports, time and attendance records, contracts, and purchase orders. AZDEMA 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.
 - International travel must be submitted to AZDEMA 45 days in advance for pre-approval and must be included in the approved application budget.
 - Meeting or conference agenda
 - Refer to the State of Arizona Accounting Manual for Travel Policy Topic 50
 - 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 AZDEMA personnel, if applicable.
 - AZDEMA requires the subrecipient to maintain the following documentation for purchases which may be requested by AZDEMA any time:
 - Specifications
 - Solicitations
 - Competitive quotes or proposals
 - Basis for selection decision
 - Contracts
 - Invoices
 - Cancelled Checks
 - Note: subrecipients should keep detailed records of all transactions involving the grant.
 - 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 the Authorized Equipment List
 - 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 application
- The select allowable equipment includes only equipment from the following AEL Categories:
 - Information Technology (Category 4)
 - Cyber-Security Enhancement Equipment (Category 5)
 - Interoperable Communications Equipment (Category 6)
 - Power Equipment (Category 10)
 - CBRNE Reference Materials (Category 11)
 - CBRNE Incident Response Vehicles (Category 12)
 - Physical Security Enhancement Equipment (Category 14)
 - CBRNE Logistical Support Equipment (Category 19)
 - Other Authorized Equipment (Category 21)

Equipment must also be necessary, reasonable, and applicable to the Emergency Management Program, and must be inventoried and available for AZDEMA inspection. AZDEMA must be notified if any equipment is surplus and any equipment with a current per unit fair market value over \$5,000 must comply with federal awarding agency disposition requirements.

- Supply costs 2 CFR § 200.314
 - 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: A cost match is required under this program. AZDEMA administers cost-matching requirements in accordance with 2 CFR § 200.306. Shared costs or matching funds and all contributions, including cash and third-party in-kind

contributions, are allowable when such contributions meet all the following criteria:

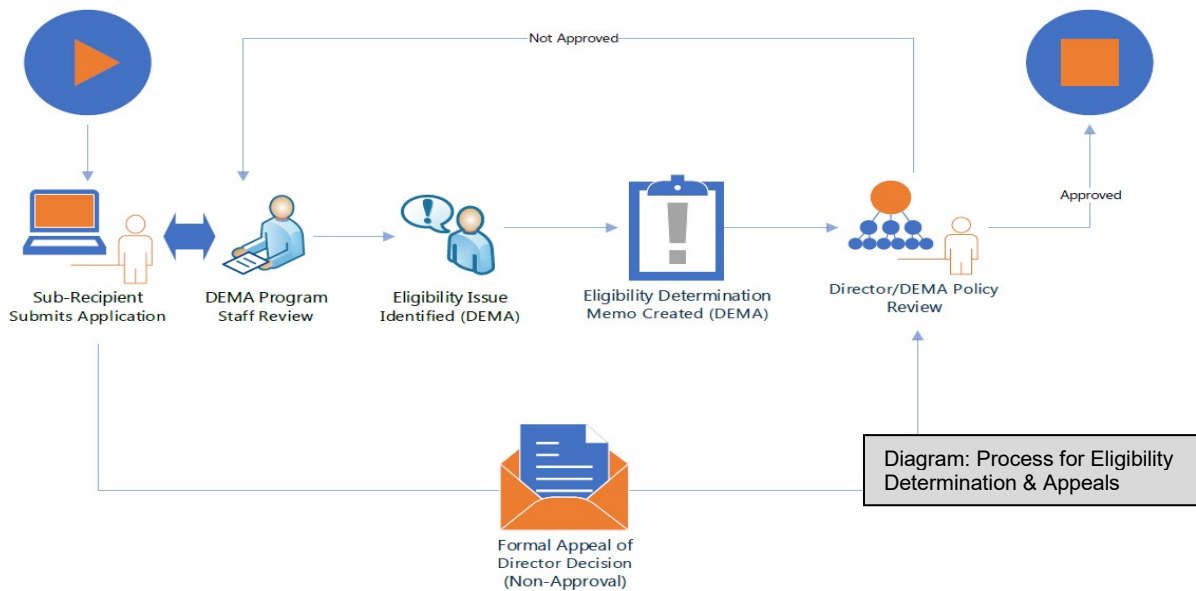
- Costs are verifiable from the non-federal entity's records
- Costs are not included as contributions for any other federal award
- Costs are necessary and reasonable for accomplishment of project or program objectives;
- Costs are allowable under Subpart E Cost Principles
- Costs are not paid by the Federal Government under another federal award
- In-Kind Match: No more than 10% of an applicant's total federal funding allocation budget will be eligible for in-kind cost matching. In-kind assistance will be limited to volunteer hours for those who attend training and exercises and third party donated facilities.
 - Volunteer hours are not allowable when in support of a private, for-profit events.
 - The following documentation is required to support these costs:
 - Activity agenda with outlined objectives and outcomes
 - Attendance roster with date and time signed in and signed out.
 - Grant Activities Outline must include a description of the activities, objectives, and outcomes of the volunteer hours
 - Supporting flyers or documentation of the planned activity.
- Non-Federal In-Kind Third-Party Donations
 - The Value of Donated Facilities or Property:
 - The value of donated land and buildings must not exceed its fair market value at the time of donation to the non-federal entity as established by an independent appraiser and certified by a responsible official of the non-federal entity (applicant).
 - An appraisal for the value of the donated facility is required to be updated every three years.
- Training and Exercise Expenses
 - Agenda to include description of event and date
 - Duration of event
 - Location
 - Number of Participants
 - Signed Attendance Roster
 - Food purchases for training/exercise events must meet the State of Arizona Accounting Manual (SAAM) definition as defined in Topic 80 Section 12
 - Ineligible - Food for meetings and refreshments
 - Work through lunches are allowable **only if** the duration exceeds six hours
 - Allowable meals are reimbursed according to the SAAM per diem rate
 - Bottled water is allowable only if potable water is not within 100 yards of training/exercise activity

Appeals, Remedies for Noncompliance, and Termination

Appeals

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

Appeals must include substantial documentation and justification not previously submit to AZDEMA.



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 pass-through 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. AZDEMA, 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, AZDEMA will provide the grant subrecipients reasonable notice of its intent to impose any measure and will make efforts to resolve the problem informally.

Key Points of Contact

Mailing Address: Arizona Department of Emergency and Military Affairs Division of Emergency Management - Grants Administration Office 5636 E. McDowell Road, Building 5101 Phoenix, Arizona 85008		
Key Points of Contact		
Policy	Grant Program	Finance
Allen Clark Director 602-464-6203 allen.clark@azdema.gov	Darlene Quihuis Assistant Director, Grant Administration 602-464-6454 darlene.quihuis@azdema.gov	Deborah (Debbie) Gann Chief Finance Officer 602-267-2730 debbie.gann@azdema.gov
Eugene Wikle Senior Assistant Director 602-464-6310 gene.wikle@azdema.gov	Diane Fernandez Program Coordinator/EMPG Lead 602-464-6268 diane.fernandez@azdema.gov	Wendy Bidon Finance Coordinator 602-267-2762 wendy.bidon@azdema.gov

APPENDIX A

Site Monitoring Checklist

Programmatic:

- Reporting maintenance and progress of NIMS adoption and implementation activities
- Grantee compliance with THIRA update requirements
- Grantee compliance with EOP revisions
- Content of EMPG Work Plan supports the state/territory advancing the “Whole Community” concept, fosters a national emergency management approach, and considers all aspects of a community to effectively prepare for, protect against, respond to, recover from and mitigate against any terrorist attack or natural disaster
- Development of a local jurisdictional multi-year IPP
- Participation in the state multi-year IPPW
- Implementation of Presidential Policy Directive (PPD)-8, including continued development and sustainment of core capabilities needed to close gaps and strengthen the state’s preparedness
- Administrative policies /procedures manuals for grants and inventory control/management
- Copy of all equipment inventory listings for purchases associated with the grants
- Equipment purchased with federal grant funds (EMPG) will be made available for viewing at visit
- Copy of all position descriptions for personnel whose salaries have been charged to the grants

Financial:

- Copy of Time and Effort reporting and separate ledger accounts kept to track revenues and expenses for each project and/or grant (2 CFR § 200.430)
- Copy of current single audit
- All financial and administrative files for the above grants. Note: Copies of all Grant Adjustment Notices should be included as well as correspondence, contracts, and agreements
- Supporting documentation for expenditures/payments charged to the grants from the beginning of the grant period through the present, including receipts, invoices, purchase orders, requisitions, contracts, travel authorization forms, travel vouchers, timecards, and payroll registers
- Policies and procedure manuals (e.g., accounting, procurement, travel, inventory control, and sub-recipient award processes). If available electronically, please provide links to this information in advance of visit
- Copy of all contracts, leases, and other agreements in excess of \$15,000

