The Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)
FY 2018 Staffing for Adequate Fire and Emergency Response (SAFER)

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

A. Program Description

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

Assistance Listings (formerly Catalog of Federal Domestic Assistance (CFDA) Number
97.083

Assistance Listings Title
Staffing for Adequate Fire and Emergency Response (SAFER)

Notice of Funding Opportunity (NOFO) Title
Fiscal Year (FY) 2018 Staffing for Adequate Fire and Emergency Response (SAFER)

NOFO Number
DHS-18-GPD-083-000-99

Authorizing Authority for Program
Section 34 of the *Federal Fire Prevention and Control Act of 1974* (Pub. L. No. 93-498, as amended) (15 U.S.C. § 2229a)

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

Program Type
New

Program Overview, Objectives, and Priorities

Program Overview
The Department of Homeland Security (DHS), Federal Emergency Management Agency's (FEMA) Grant Programs Directorate (GPD) is responsible for the implementation and administration of the Staffing for Adequate Fire and Emergency Response (SAFER) grant program.

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

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

Program Objectives
The purpose of the SAFER Grant Program is to provide funding directly to fire departments and volunteer firefighter interest organizations to assist in increasing the number of firefighters to help communities meet industry minimum standards and attain 24-hour staffing to provide adequate protection from fire and fire-related hazards, and to fulfill traditional missions of fire departments.

The objective of the SAFER grant program is to assist local fire departments with staffing and deployment capabilities to respond to emergencies and assure that communities have adequate protection from fire and fire-related hazards. Local fire departments accomplish this by improving staffing and deployment capabilities so they may more effectively and safely respond to emergencies. With enhanced staffing levels, recipients should experience a reduction in response times and an increase in the number of trained personnel assembled at the incident scene.

Although not required for a SAFER grant, it is preferable that the enhanced staffing levels of all SAFER recipients should ensure that all first-arriving apparatus are staffed with a minimum of four qualified personnel (to meet National Fire Protection Association

(NFPA) 1710/1720 standards) who are capable of initiating the suppression response. Ultimately, SAFER recipients should achieve more efficient responses and safer incident scenes, thereby ensuring communities have improved protection from fire and fire-related hazards.

In awarding grants, the Administrator of FEMA is required to consider the following:

- The findings and recommendations of the Technical Evaluation Panel (TEP);
- The degree to which an award will reduce deaths, injuries, and property damage by reducing the risks associated with fire related and other hazards; and
- The extent of an applicant's need for a SAFER grant and the need to protect the United States as a whole.

SAFER offers grants to support projects in two activities. This NOFO provides potential eligible applicants with application requirements and details for processing and evaluating applications for financial assistance for both of these activity areas.

- **Hiring of Firefighters Activity** is to hire new, additional firefighters to improve staffing levels or changing the status of part-time or paid-on-call firefighters to full-time firefighters

- **Recruitment and Retention of Volunteer Firefighters Activity** is to assist fire departments with the recruitment and retention of volunteer firefighters who are involved with or trained in the operations of firefighting and emergency response

Priorities
Each activity has specific priorities and objectives. For additional details, please see Appendix B – Programmatic Information and Priorities, Section IV. Funding Priorities.

Performance Metrics
Performance metrics for the program are as follows:

1. Percent of "majority career" SAFER recipients' structural fire responses that complied with NFPA 1710 structural response standards.
2. Percent of "majority volunteer" SAFER recipients' structural fire responses that complied with NFPA 1720 structural response standards.
3. Percent of SAFER hiring recipients who reported and provided evidence that the grant funding increased compliance with NFPA 1710 or 1720 assembly and deployment standards.

B. Federal Award Information

Award amounts, important dates, and extensions

Available funding for the NOFO: $350,000,000

Projected number of Awards: 300

Period of performance: 12-48 Months

- **Hiring of Firefighters Activity:** The period of performance will be 36 months for all grants awarded under the Hiring of Firefighters Activity.

- **Recruitment and Retention of Volunteer Firefighters Activity:** The period of performance will be between 12 and 48 months for all grants awarded under the Recruitment and Retention of Volunteer Firefighters Activity.

Projected period of performance start date(s): *07/01/2019*

Projected period of performance end date(s): *06/30/2020-06/30/2023*

Funding instrument: Grant

Extensions: Extensions to the period of performance under the Recruitment and Retention of Volunteer Firefighters Activity generally are not allowable. FEMA will consider extension requests to the period of performance under the Recruitment and Retention of Volunteer Firefighters Activity only in extenuating circumstances (such as those fire departments whose operations were significantly impacted due to presidentially declared disasters). Extensions to the period of performance under the Hiring Activity are not allowable.

C. Eligibility Information

Eligible Applicants

Under the FY 2018 SAFER Grant Program, eligible applicants are limited to those entities described below within each activity:

- **Hiring of Firefighters Activity**
  Volunteer, combination, and career fire departments are eligible to apply for funding.

  National, state, local, or federally recognized tribal organizations representing the interests of volunteer firefighters are not eligible to receive a SAFER Grant Award under the Hiring of Firefighters Activity.

- **Recruitment and Retention of Volunteer Firefighters Activity**
  Volunteer and combination fire departments and National, state, local, or federally recognized tribal organizations representing the interests of volunteer firefighters are eligible to apply for funding.

  Career fire departments are not eligible to receive a SAFER Grant Award under the Recruitment and Retention of Volunteer Firefighters Activity.

Volunteer fire departments and combination fire departments may apply for funding under both activities; however, departments must complete separate applications for each activity. Applicants are limited to one application per activity, per application period. If an applicant submits two applications for the same activity during a single application period, FEMA will disqualify both applications.

Municipalities and fire districts may submit applications on behalf of fire departments lacking the legal status to do so, such as those under the support of the municipality or district. The municipality or fire district may submit only one application under the Hiring of Firefighters Activity per application period for each eligible fire department within the municipality or fire district.

The following entities are **NOT** eligible to apply under this announcement:

- Federal fire departments and fire departments under contract to the Federal Government whose sole responsibility is the suppression of fires on federal installations or lands;
- For-profit fire departments and organizations (*e.g.*, fire departments that do not have specific nonprofit status or that are not municipally based);
- Ambulance services, emergency medical service organizations, rescue squads, auxiliaries, dive teams, and urban search and rescue teams;
- Non-federal airport or port authority fire departments whose sole responsibility is the suppression of fires on the airport grounds or port facilities, unless the airport/port fire department has a formally recognized arrangement with the local jurisdiction to provide fire suppression on a first-due basis outside the confines of the airport or port facilities;
- Fire stations that are part of, controlled by, or under the day-to-day operational direction of a larger fire department or agency, or that are not otherwise independent; and
- State and local agencies, such as forest service, fire marshals, emergency management offices, hospitals, and training offices.

Each activity has its own application and eligibility requirements, as outlined in Appendix B – Programmatic Information and Priorities, Section IV. Funding Priorities.

Eligibility Criteria

Minimum Budget Requirement

At the time of application, both SAFER Hiring of Firefighter Activity and Recruitment and Retention of Volunteer Firefighters Activity grant applicants are required to certify their annual budget for fire-related programs and emergency response must not have been reduced below 80 percent of the applicant's average funding level in the three years prior to the date it applies for the grant. *See* 15 U.S.C. § 2229a(c)(2).

Applicants experiencing economic hardship may apply for a waiver of this requirement. Please see Appendix C: Award Administration Information.

Other Eligibility Criteria

National Incident Management System (NIMS) Implementation
SAFER Grant Program applicants are not required to be in compliance with the National Incident Management System (NIMS) to apply for funding under this NOFO or to be awarded a grant under this NOFO. However, any applicant that receives an FY 2018 SAFER Grant Program award must achieve the level of NIMS compliance required by the Authority Having Jurisdiction (AHJ) over the applicant's emergency service operations (*e.g.*, a local government), prior to the end of the grant's period of performance.

Maintenance of Effort (MOE)
There is no maintenance of effort requirement for the FY 2018 SAFER grant program.

Cost Share or Match

- **Recruitment and Retention of Volunteer Firefighters Activity**
  Recipients of SAFER Recruitment and Retention of Volunteer Firefighters Activity grants are not required to contribute a Cost Share or Match (non-federal funds).

- **Hiring of Firefighters Activity**
  Recipients of SAFER Hiring of Firefighters Activity grants are required to contribute non-federal funds subject to a Position Cost Limit and a Cost Share, as described below.

  All recipients should ensure that they are thoroughly familiar with FEMA's cost sharing requirements identified below, as well as the appropriate cost principles as identified at 2 C.F.R. § 200.101(b)(1).

  FEMA does not require the recipient to have the cost share at the time of application. However, before FEMA awards a grant, it may contact potential awardees to determine whether the recipient has the funding in hand or if the recipient has a viable plan to obtain the funding necessary to fulfill the cost-sharing requirement.

  Position Cost Limit (Waiver Available)
  The amount of federal funding provided to a recipient under the SAFER Hiring of Firefighters Activity for hiring a new firefighter in any fiscal year may not exceed:
  - in the first and second years of the grant, 75 percent of the usual annual cost of a first-year firefighter in that department at the time the grant application was submitted; and
  - in the third year of the grant, 35 percent of the usual annual cost of a first-year firefighter in that department at the time the grant application was submitted.

  "Usual annual costs" includes the base salary (excluding non-FLSA overtime) and the standard benefits package (including the **average** health cost, dental, vision, FICA, life insurance, retirement/pension, etc.) offered by fire departments to first-year (*i.e.*, entry-level) firefighters. Please refer to Appendix B: Programmatic Information and Priorities regarding eligible and ineligible costs for SAFER Hiring of Firefighter Activity grants.

The eGrants system automatically calculates the Position Cost Limit in the Budget section of the application.

Cost Share (Waiver Available)
Under the SAFER Hiring of Firefighters Activity, grant recipients are required to contribute a Cost Share toward the actual cost of hiring firefighters under this program. The Federal portion of the costs of hiring firefighters under this grant may not exceed:

- 75 percent of the actual costs incurred in each of the first and second years of the grant; and
- 35 percent of the actual costs incurred in the third year of the grant.

Therefore, the recipient is required to contribute at least the following in non-Federal funds:

- 25 percent of the actual costs incurred in each of the first and second years of the grant; and
- 65 percent of the actual costs incurred in the third year of the grant.

A Cost Share of non-federal cash is the only allowable recipient contribution. Grant recipients can apply to waive this requirement.

Example: Position Cost Limit and Cost Share
The Position Cost Limit and Cost Share work together, depending on amount expended, to limit the federal share. For example:

Suppose the applicant submits a SAFER Hiring of Firefighter Activity grant application for one new firefighter. At the time that application is submitted, the usual annual cost of a first-year firefighter in that department is $100,000. No matter what the department ends up paying the firefighter (for example, even if the department ends up paying the new hire $110,000), the Position Cost Limit, will cap the federal funding to:

- Year 1 = $75,000
- Year 2 = $75,000
- Year 3 = $35,000.

But, suppose the grant is awarded and the department accrues actual costs that are different from the usual annual cost of a first-year firefighter in the department. If the following actual costs during the term of the grant are:

- Year 1 = $80,000
- Year 2 = $95,000

- Year 3 = $110,000.

Then the Cost Share will further limit the federal contribution, unless this requirement is waived. In other words, the federal portion can neither be more than the Position Cost Limit *nor* be more than the Cost Share, and applicants must assess both restrictions to determine where and whether the caps apply. In this example, the federal portion will be:

- Year 1
  - If the Cost Share requirement is not waived
    - Federal funds will be limited to $60,000, or 75 percent of actual costs incurred ($80,000)
  - If the Cost Share requirement is waived
    - Federal funds will cover no more than $75,000, or 75 percent of the usual cost of a firefighter at the time of application ($100,000)
- Year 2
  - If the Cost Share requirement is not waived
    - Federal funds will be limited to $71,250, or 75 percent of actual costs incurred ($95,000)
  - If the Cost Share requirement is waived
    - Federal funds will cover no more than $75,000, or 75 percent of the usual cost of a firefighter at the time of application ($100,000)
- Year 3
  - If the Cost Share requirement is not waived
    - Federal funds will be limited to $35,000 due to the Position Cost Limit of 35 percent of the usual cost of a firefighter at the time of application ($100,000).
  - If the Cost Share requirement is waived
    - Federal funds will cover no more than $35,000, or 35 percent of the usual cost of a firefighter at the time of application ($100,000).

Economic Hardship Waiver of Cost Share, Position Cost Limit, Supplanting, or Minimum Budget Requirement

The FEMA Administrator may waive or reduce the Cost Share, Position Cost Limit, Minimum Budget, or Supplanting requirements in cases of demonstrated economic hardship. Please see Appendix C: Award Administration Information.

D. Application and Submission Information

Key Dates and Times

Date posted to Grants.gov:	*02/15/2019*
Application start date:	*02/15/2019 at 8:00 AM Eastern Time*
Application submission deadline:	*03/22/2019 at 5:00 PM Eastern Time*
Anticipated funding selection date:	*05/01/2019*
Anticipated award date:	*07/31/2019*

In general, DHS/FEMA will not review applications received after the deadline or consider them for funding. However, DHS/FEMA may extend the application deadline on request for any applicant who can demonstrate good cause exists to justify extending the deadline. Good cause for an extension may include technical problems outside of the applicant's control that prevent submission of the application by the deadline or other exigent or emergency circumstances. If applicants experience technical issues, they must notify the FEMA Help Desk as soon as possible.

Other Key Dates

Event	Suggested Deadline for Completion
Obtaining DUNS Number	Four weeks before actual submission deadline
Obtaining a valid EIN	Eight weeks before actual submission deadline
Updating SAM registration	Four weeks before actual submission deadline
Submitting complete application in eGrants	One week before actual submission deadline

Address to Request Application Package

The online FY 2018 SAFER application is available through the Assistance to Firefighters Grant Program's (AFGP) eGrants system application portal, at https://portal.fema.gov/.

There are several ways to access application information:

- AFGP website (http://www.fema.gov/firegrants)
- Grants.gov (http://www.grants.gov)
- U.S. Fire Administration (http://www.usfa.fema.gov)

Hard copies of the application are not available. However, the Telephone Device for the Deaf (TDD) and/or Federal Information Relay Service (FIRS) number available for this Notice is (800) 462-7585.

FEMA will process applications through the eGrants portal. Application tutorials and Frequently Asked Questions (FAQs) explain the current SAFER grant program, assist with the online grant application, and highlight lessons learned and changes for FY 2018. For more details, please visit the AFGP website at http://www.fema.gov/firegrants.

Content and Form of Application Submission

DHS makes all funding opportunities available on the internet, accessible at http://www.grants.gov. If applicants experience difficulties accessing information or have any questions, please call the Grants.gov Contact Center at (800) 518-4726.

The Grants.gov website will direct applicants to the eGrants system application portal, at https://portal.fema.gov/, which contains the online SAFER application. The online SAFER application incorporates all required forms.

The eGrants system will allow an authorized representative to log in and create a user name and password. This user name and password is specific to the authorized user and must not be shared with other personnel. If the applicant has submitted any AFGP applications (including Assistance to Firefighters Grant (AFG), Staffing for Adequate Fire and Emergency Response (SAFER), Fire Prevention and Safety (FP&S), or Station Construction Grant (SCG)) in a previous grant cycle, they must continue to use the same username, password, and DUNS number for any FY 2018 application(s).

If the applicant's authorized representative has forgotten the password or the primary point of contact has changed, please visit http://www.fema.gov/assistance-firefighters-grant-program-most-frequently-asked-questions for instructions on how to update and correct the organization's information.

The automated application contains help screens and drop-down lists to assist applicants throughout the process. Applicants can save, retrieve, update, and revise their work through the end of the application period. Applicants should save their work often as the electronic application includes a time-out feature. The automated system does not allow applicants to submit incomplete applications. The system alerts applicants when required information has not been entered.

Prior to final submission, an online application may be saved, retrieved, or edited, up to the application deadline.

Technological Note: The application system and related websites may have issues with any other browser other than Internet Explorer (IE 6 or higher). The eGrants system is compatible up to Internet Explorer 11, which should be used if available. Do not have multiple browser tabs open when entering information, even when using Internet Explorer. Several known problems occur when entering application information using non-IE browsers or having multiple browsers open, including but not limited to:

- System failure to recognize correct information.
- System failure to capture and retain correct information.
- System functions such as "cut and paste" being disabled.

NO APPLICATION WILL BE RELEASED BACK TO THE APPLICANT AFTER FINAL SUBMISSION

After an application has been completed and submitted, no changes can be made. There is no appeal process for inaccurate or incomplete information retained by the system due to improper or multiple browser usage by applicants.

The primary point of contact listed in an application will receive an automatic email notification via the eGrants system once the system receives their application.

Unique Entity Identifier and System for Award Management (SAM)

All applicants for this award must:

1. **Be registered in SAM before submitting its application;**
2. **Provide a valid DUNS number in its application; and**

3. **Continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by DHS FEMA.**

DHS is participating in the Grants.gov initiative that provides the grant communities with a single site to find grant funding opportunities. Before applying for a DHS Grant, applicants must have a Data Universal Number System (DUNS) number and must be registered in SAM.

DUNS
Instructions for obtaining a DUNS number can be found here: http://www.grants.gov/web/grants/applicants/organization-registration/step-1-obtain-duns-number.html

System for Award Management (SAM)
Applicant registration in SAM is free. All applicants must register in order to apply online. Step-by-step instructions for registering with SAM can be found here: http://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html. Please remember that SAM registration is only active for one year and must be renewed annually.

Existing SAM.GOV account holders should check their account to make sure it is "**ACTIVE**." SAM registration should be completed at the very beginning of the application period and should be renewed annually to avoid being "**INACTIVE**."

Please allow plenty of time before the grant application submission deadline to obtain a DUNS number and then to register in SAM. It may be four weeks or more after an applicant submits the SAM registration before the registration is active in SAM, and then may be an additional 24 hours before Grants.gov recognizes the information.

FEMA may not make an award to an entity until the entity has complied with the requirements to provide a valid DUNS number and maintain an active SAM registration with current information. If the applicant is noncompliant with this requirement at the time FEMA is ready to make a federal award offer, then FEMA may determine the applicant is not qualified to receive an award and may use that determination as a basis for making the federal award to another applicant.

IMPORTANT: Applicants must complete the SAM registration process. It is imperative that the information applicants provide is correct and current. Please ensure that your organization's name, address, DUNS number, and Employer Identification Number, or EIN, are up to date in SAM and that the DUNS number used in SAM is the same one used to apply for all other FEMA awards. The organization's name on the SF 1199A Direct Deposit Form must be entered as it appears in SAM. Payment under any FEMA award is contingent on the recipient's having a current SAM registration.

Help with SAM
The SAM quick start guide for new recipient registration and SAM video tutorial for new applicants are tools created by the General Services Administration (GSA) to assist those registering with SAM. If applicants have questions or concerns about a SAM registration, please contact the Federal Support Desk at https://www.fsd.gov/fsd-gov/home.do or call toll free (866) 606-8220.

How to Get a Commercial and Government Entity (CAGE) Code
To get a CAGE code, applicants must first register with SAM, which is a requirement for doing business with the Federal Government. Applicants will receive a CAGE code as part of the SAM validation process, and as soon as the registration is active, applicants may view the CAGE code online by logging in to their SAM accounts.

Timely Receipt Requirements and Proof of Timely Submission
All applications must be received by 03/08/2019 at 5:00:00 PM ET. The AFG eGrants System automatically records proof of timely submission and the system generates an electronic date/time stamp when AFG eGrants successfully receives the application. This applicant with the Point of Contact (POC) role will also receive the official date/time stamp and an AFG eGrants tracking number in an email serving as proof of their timely submission on the date and time that AFG eGrants received the application. Applications received by AFG eGrants after the established due date for applications will be considered late and will not be considered for funding.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before AFG eGrants receives your application. AFG eGrants will provide either an error message or a successfully received transmission in the form of an email sent to the applicant with the POC role. The eGrants Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Do not do this – it may cause your application to fail to be submitted and consequently not be considered for funding. Please be patient and give the system time to process the application.

Intergovernmental Review
An intergovernmental review may be required. Applicants must contact their State's Single Point of Contact (SPOC) to comply with the State's process under Executive Order 12372. *(See https://www.archives.gov/federal-register/codification/executive-order/12372.html; https://www.whitehouse.gov/wp-content/uploads/2017/11/SPOC-Feb.-2018.pdf).*

Funding Restrictions
Applicants may only use the Federal funds made available through this program for the purpose(s) set forth in the award package and this use must be consistent with the statutory authority for the award. Applicants may not use award funds for matching funds for any other federal grants/cooperative agreements, lobbying, or intervention in federal regulatory or adjudicatory proceedings. In addition, applicants may not use federal funds to sue the Federal Government or any other government entity. Failure to adhere to the

award conditions will cause the recipient to be considered in default of the grant agreement and may require the return of all federal funds disbursed under the grant.

Applicants may submit only one application per eligible activity. Any applicant that submits more than one application per activity will have *all* applications within that activity deemed ineligible.

For more information on restrictions on use of funds, please see Appendix B: Programmatic Information and Priorities.

Construction or Remodeling/Renovation Costs. Construction costs are not eligible under the SAFER grant program. Construction includes major alterations to a building that changes the profile or footprint of the structure. To support eligible awarded activities under the SAFER Recruitment and Retention of Volunteer Firefighters Activity, remodeling/renovations to an existing facility are limited to minor interior alterations costing less than $10,000.00 and should be requested under Modification to Facilities. **IMPORTANT**: Some of these activities may require an Environmental and Historic Preservation (EHP) review; certain costs associated with an EHP Review are eligible for reimbursement.

Environmental and Historic Preservation (EHP)
As a federal agency, DHS/FEMA is required to consider the effects of its actions on the environment and historic properties to ensure that all activities and programs funded by the agency, including grants-funded projects, comply with Federal EHP regulations, laws, and Executive Orders as applicable.

Recipients proposing projects that have the potential to impact the environment, including but not limited to modification or renovation of existing buildings, structures, and facilities, must participate in the FEMA EHP Review process. The EHP Review process involves the submission of a screening form that includes a detailed project description that explains the goals and objectives of the proposed project along with supporting documentation so that FEMA may determine whether the proposed project has the potential to impact environmental resources and/or historic properties. In some cases, FEMA must also to consult with other regulatory agencies and the public to complete the review process. The EHP Review process must be completed before funds are released to carry out the proposed project. FEMA will not fund projects that are initiated without the required EHP Review.

Additionally, all recipients are required to comply with FEMA EHP Policy Guidance. This EHP Policy Guidance is located in FEMA Policy (FP) 108-023-1, Environmental Planning and Historic Preservation Policy Guidance.

SAFER projects that involve installation of equipment not specifically excluded from a FEMA EHP Review per the GPD Programmatic Environmental Assessment (PEA); ground-disturbing activities; or modification/renovation of existing buildings or structures must undergo FEMA EHP Review.

No facilities modification project can proceed, with the exception of project planning, prior to formal FEMA approval. Recipients may request funds for activities that do not require EHP Review.

The following activities would not require submission of the FEMA EHP Screening Form:

- Planning and development of policies or processes;
- Management, administrative, or personnel actions;
- Classroom-based training; and
- Acquisition of mobile and portable equipment (not involving installation) on or in a building.

The EHP Screening form and instructions are available at https://www.fema.gov/media-library/assets/documents/90195. If necessary, complete the EHP Screening form and submit to the EHP Office at GPDEHPInfo@fema.dhs.gov.

Indirect Facilities & Administrative (F&A) Costs

Indirect F&A costs are those costs incurred for a common or joint purpose benefitting more than one cost objective. These costs are not readily assignable to the costs objectives specifically benefitted, without effort disproportionate to the results achieved. Indirect costs are allowable under the Recruitment and Retention of Volunteer Firefighters Activity, as described in 2 C.F.R. § 200.414. With the exception of recipients who have never received a negotiated indirect cost rate as described in 2 C.F.R. § 200.414(f), recipients must have an approved indirect cost rate agreement with their cognizant federal agency to charge indirect costs to this award. A copy of the approved rate (a fully executed, agreement negotiated with the applicant's cognizant federal agency) is required at the time of application, and must be provided to FEMA before indirect costs are charged to the award. Applicants must submit copies of the indirect cost rate agreements, along with the SAFER application number, electronically to FireGrants@fema.dhs.gov.

FEMA will evaluate indirect costs as part of the application for federal funds and these costs must be included as a line item in the Request Details section of the application so FEMA can determine if they are allowable, if they are reasonable, or if they disproportionally impact an application's cost benefit.

Management and Administration

Management and administrative (M&A) expenses are not operational costs but are necessary costs incurred in direct support of the grant or as a consequence of it. As such, these costs can be itemized in financial reports. Applicants should base M&A expenses only on actual expenses or known contractual costs; requests that are simple percentages of the award without supporting justification will not be allowed or considered for reimbursement. Salaries and fringe benefits for personnel directly supporting the grant should not be included in the M&A budget line item.

No more than 3 percent of the federal share of SAFER Recruitment and Retention of Volunteer Firefighters Activity funds may be expended by the recipient for management and administration (M&A) purposes associated with the SAFER award.

M&A costs are not eligible under the Hiring of Firefighters Activity.

Pre-award Costs
Only costs incurred during the period of performance are allowable. However, recipients under the Recruitment and Retention of Volunteer Firefighters Activity may request reimbursement for grant writer fees (*see* Appendix C: Award Administration Information, Section II. Grant Writer/Preparation Fees; *see also* Appendix B: Programmatic Information and Priorities, Section V. Eligible and Ineligible Costs).

E. Application Review Information

1. Application Evaluation Criteria

Each year, FEMA convenes a panel of fire service professionals to develop funding priorities for the SAFER grant program. The panel makes recommendations about funding priorities as well as about developing criteria for awarding grants. The content of this NOFO reflects implementation of this Criteria Development Panel's (CDP) recommendations with respect to the priorities, direction, and criteria for awards.

The **nine major fire service organizations** represented on the CDP are:

- Congressional Fire Service Institute
- International Association of Arson Investigators
- International Association of Fire Chiefs
- International Association of Fire Fighters
- International Society of Fire Service Instructors
- National Association of State Fire Marshals
- National Fire Protection Association
- National Volunteer Fire Council
- North American Fire Training Directors

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

(1) financial stability;
(2) quality of management systems and ability to meet management standards;
(3) history of performance in managing federal award;
(4) reports and findings from audits; and
(5) ability to effectively implement statutory, regulatory, or other requirements.

2. Supplemental Financial Integrity Review

Prior to making a federal award where the anticipated federal share of a federal award will be greater than the simplified acquisition threshold, currently $250,000 (*see Section 805 of the National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 115-91, OMB Memorandum M-18-18 at https://www.whitehouse.gov/wp-content/uploads/2018/06/M-18-18.pdf; see also FEMA GPD Information Bulletin No. 434, Increases and Changes to the Micro-Purchase and Simplified Acquisition Thresholds*):

- DHS/FEMA is required to review and consider any information about the applicant that is in the designated integrity and performance system accessible through the System for Award Management (SAM), which is currently the Federal Awardee Performance and Integrity Information System (FAPIIS) and is also accessible through the SAM website.
- An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a federal awarding agency previously entered.
- DHS/FEMA will consider any comments by the applicant, in addition to the other information in FAPIIS, when making a judgment about the applicant's integrity, business ethics, and record of performance under federal awards when completing the review of risk posed by applicants as described in 2 C.F.R. § 200.205.

3. Review and Selection Process

FEMA competitively scores and reviews all applications submitted under this NOFO a through the multi-phase process outlined below:

a. Pre-scoring

FEMA evaluates all complete and eligible applications relative to the SAFER Grant Program funding priorities (*see* information on the funding priorities in Appendix B – Programmatic Information and Priorities, Section IV. Funding Priorities). This review is accomplished through pre-scoring and the peer review panel process. General and activity-specific information submitted in the application will determine an applicant's initial standing relative to SAFER grant funding priorities. Applications most consistent with the SAFER grant funding priorities score higher in the automated pre-score evaluation. The pre-score represents 50 percent of the total application score under the Hiring of Firefighters Activity. The pre-score represents 30 percent of the total application score under the Recruitment and Retention of Volunteer Firefighters Activity. Application Narrative Statements are not reviewed during pre-score.

b. Peer Review Panel

A panel of at least three peer reviewers performs the second phase of an application's evaluation. The panel is composed of fire service representatives recommended by the national organizations from the CDP. These panelists evaluate the application using the Narrative Statement, answers to the general questions, and answers to the activity-specific questions provided in the application. The panelists evaluate each application on its own merits against established criteria and not compared to other applications. The peer review panel score represents 50 percent of the total application score. Panelists use the Narrative Evaluation Criteria listed on pages 17-21 of this NOFO to score each Narrative Statement.

4. **Drafting the Narrative Statement**

NOTE: Applicants should save their work often as the electronic application includes a time-out feature. If no-save activity is detected for a period of time, the application will time-out and all information that is not saved could be lost. Therefore, FEMA recommends that applicants type Narrative Statements offline using a word processing program to avoid losing any information.

Once the Narrative Statement is complete, applicants can then cut-and-paste the text into the appropriate sections within the Narrative Statement section of the online application.

Please note that the Narrative Statement blocks do not allow for formatting. Do not type the narrative using only capital letters. Additionally, do not include tables, special fonts (*e.g.*, quotation marks, bullets), or graphs.

Space for the Narrative Statement is limited to no more than 2,000 characters unless otherwise noted below, and each element must have a minimum of at least 200 characters in order to submit the application.

Once the applicant saves the Narrative Statement to the online application, log-out and then log back in to the application to verify that the information saved successfully.

5. **Narrative Evaluation Criteria**

The Narrative Statement must provide specific details about the activity for which the applicants seek funding, including budget details. Applicants must explain how the proposed activity(ies) relate to the Hiring of Firefighters Activity or the Recruitment and Retention of Volunteer Firefighters Activity. FEMA reviews and compares applications for duplication. Therefore, all elements of the Narrative Statement must be original.

In applications for the Recruitment and Retention of Volunteer Firefighters Activity, applicants must provide details regarding how volunteers will qualify for the incentives (*i.e.*, who will be eligible for initiatives funded under the grant and discuss any prerequisites). For example, an organization might withhold paying nominal stipends until members participate in a minimum number of operational activities. This type of information needs to be in the Narrative Statement.

Panelists will evaluate and score each activity based on the following narrative elements within each activity described in the Narrative Statement:

i. Hiring of Firefighters Activity

The Narrative Statement for applications requesting Hiring of Firefighters Activity funding must include all four elements. The panelists will evaluate each element independently. Each element's relative weight in the determination of the grant award is listed below:

1) Project Description (30 percent):

a) Why does the department need the positions requested in this application?
b) How will the positions requested in this application be used within the department (*e.g.*, fourth firefighter on engine, open a new station, eliminate browned out stations, reduce overtime).
c) What specific services will the requested positions provide to the fire department and community?
d) Describe how funds awarded through this grant enhance the department's ability to protect critical infrastructure within the primary response area?

2) Impact on Daily Operations (30 percent):

a) Explain how the community and the current firefighters employed by the department are at risk without the positions requested in this application.
b) How will that risk will be reduced if awarded?

3) Financial Need (30 percent):

a) Provide an income versus expenses breakdown of the current annual budget.
b) Describe the department's budget shortfalls and inability to address financial needs without federal assistance.
c) What other actions has the department taken to obtain funding elsewhere (*e.g.* state assistance programs, other grant programs)?
d) Discuss how the critical functions of the department are affected without this funding.

4) Cost Benefit (10 percent):

Describe the benefits (*e.g.*, quantifying the anticipated savings and/or efficiencies) the department and community will realize if awarded the positions requested in this application.

ii. Recruitment and Retention of Volunteer Firefighters Activity (Fire Departments)

The Narrative Statement for applications requesting this funding must include all four elements. The panelists will evaluate each element independently. Each element's relative weight in the determination of the grant award is listed below. The peer review evaluation score represents 70 percent of the total application score.

1) **Project Description (30 percent):**
   a) Describe the problems and issues the department is experiencing in recruiting new volunteer firefighters.
   b) What are the problems and issues the department is experiencing in retaining current members?
   c) Describe the implementation plan, including the goals, objectives, methods, specific steps, and timelines to directly address the identified problems or issues.
   d) Describe the current marketing plan already in place or the marketing program to be put in place with grant funds.
   e) Describe how the program will be evaluated for its impact on identified recruitment and retention problems and issues. How will the overall effectiveness of the grant will be measured?
   f) Describe the specific services the new volunteer firefighters and/or retention of current volunteer firefighters will provide for the fire department(s) and community.
   g) If the grant request will have a regional impact, discuss how the regional partners will benefit and which activities they will benefit from.

2) **Impact on Daily Operations (30 percent):**
   a) Describe how the community and current volunteer firefighters in the department are at risk without the items or activities requested in this application.
   b) How will the risk be reduced if awarded?
   c) Explain the impact the recruitment of new volunteer firefighters and/or the retention of current volunteer firefighters will have on the department's NFPA compliance.

3) **Financial Need (30 percent):**
   a) Provide an income versus expenses breakdown of the department's current annual budget.
   b) Describe the department's budget shortfalls and its inability to address financial needs without federal assistance.
   c) What other actions has the department taken to obtain funding elsewhere (*e.g.*, state assistance programs, other grant programs)? How have similar projects have been funded in the past?
   d) Discuss how the critical functions of the department are affected without this funding.

4) **Cost Benefit (10 percent):**
   Describe the benefits (*e.g.*, quantifying the anticipated savings and/or efficiencies) the department and community will realize if awarded the items or activities requested in this application.

iii. **Recruitment and Retention of Volunteer Firefighters Activity (national, state, local, or federally recognized tribal volunteer firefighters interest organizations)**

The Narrative Statement for applications requesting this funding must include all four elements. The panelists will evaluate each element independently. Each element's relative weight in the determination of the grant award is listed below. The peer review evaluation score represents 70 percent of the total application score.

1) **Project Description (30 percent):**
   a) Describe the problems and issues the fire departments that the organization will be reaching with this grant are experiencing in recruiting new volunteer firefighters.
   b) What are the problems and issues the same departments are experiencing in retaining current members?
   c) Describe the organization's implementation plan, including the goals, objectives, methods, specific steps, and timelines to directly address the problems or issues identified.
   d) Describe the current marketing plan already in place, or the marketing program to be put in place with grant funds.
   e) Describe how the program will be evaluated for its impact on the identified recruitment and retention problems and issues of the fire departments participating in this grant. Describe how the overall effectiveness of the grant will be measured.
   f) Describe the specific services the new volunteer firefighters and/or retention of current volunteer firefighters will provide for the fire departments participating in this application and their respective communities.
   g) Describe the organization's procurement practices and the timelines outlining the chronological steps to complete the activities requested in this application.

2) **Impact on Daily Operations (30 percent):**
   a) Describe how the fire departments participating in this application and their current volunteer firefighters and communities are at risk without the items or activities requested in this application.
   b) How will that risk be reduced if awarded?
   c) Describe the impact that the recruitment of new volunteer firefighters and/or the retention of current volunteer firefighters will have on the NFPA compliance of the fire departments participating in this application.

3) **Financial Need (30 percent):**
   a) Provide an income versus expenses breakdown of the current annual budget.
   b) Describe the organization's budget shortfalls and the inability to address the financial needs without federal assistance.

c) Discuss how the critical functions of the organization are affected without this funding.
d) What other actions has the organization taken to obtain funding elsewhere (*e.g.* state assistance programs, other grant programs)? How have similar projects have been funded in the past?

4) Cost Benefit (10 percent):
Describe the benefits (*e.g.*, quantifying the anticipated savings and/or efficiencies) the fire departments participating in this application and their communities will realize if awarded the items or activities requested in this application.

6. Technical Evaluation Process (TEP)
FEMA will deem the highest ranked applications from both activities to be in the fundable range. The SAFER Program Office will then perform a Technical Review of applications that are in the fundable range prior to recommending awards. The SAFER Program Office will assess the requests with respect to costs, quantities, feasibility, eligibility, and recipient responsibility prior to recommending any application for an award.

Once the review process is complete, FEMA will determine each application's cumulative score and create a final ranking of applications. FEMA will award grants based on this final ranking and the possible recipients' abilities to meet the statutorily required funding limitations outlined in Appendix B – Programmatic Information and Priorities, Section III. Funding Limitations.

F. Federal Award Administration Information

Notice of Award
Once FEMA has approved and recorded an award in the system, eGrants sends an award package to the grant official authorized by the recipient. The eGrants system will provide the award package and email notification. The authorized grant official should follow the directions in the notification to accept the award documents. The authorized grant official should read the award package carefully for instructions on administering the grant, to determine whether there has been an adjustment to the award, and to become familiar with the terms, conditions and responsibilities of federal award recipients.

The offered award will remain on hold and be available for a maximum of 30 days until the recipient either accepts or declines the award via the online AFGP eGrants system. The recipient should follow the directions in the notification to confirm acceptance of the award.

Failure to accept the grant award within 30 days of an offer of award may result in a loss of funds. Recipients may request additional time to accept the award if needed.

Differences Between Application Request and Award
During the review process for a SAFER award, FEMA may have modified the application request(s). These modifications will be identified in the award package provided upon the offer of an award.

If the awarded activities, scope of work, or requested dollar amount(s) do not match the application as submitted, the recipient shall only be responsible for completing the activities actually funded by FEMA. The recipient is under no obligation to start, modify, or complete any activities requested by but not funded by the award. The award package will identify any differences under the Negotiation section.

Turndown Notifications
The eGrants system will provide all applicants who do not receive an FY 2018 SAFER award with a turndown notification.

The notification email will briefly describe why FEMA did not recommend the application for funding. Due to the historical volume of applications and turndowns, detailed debriefs for each applicant are not possible.

Period of Performance Guidance

i. **Hiring of Firefighters Activity**
   - The period of performance is 36 months for all grants awarded under this activity.
   - A default 180-day recruitment period begins when FEMA approves an application for an award under this activity.
   - The 36-month period of performance automatically starts after the 180-day recruitment period, regardless of whether the recipient has successfully hired the requested firefighters. The period of performance cannot start later than 180 days after the award date.
   - If a recipient is able to hire SAFER-funded firefighters during the 180-day recruitment period, the period of performance may begin at that time. However, in these instances, recipients must submit an amendment requesting that the period of performance start before the end of the 180-day recruitment period if they wish to begin the period early.
   - Extensions to the period of performance are not permitted.

ii. **Recruitment and Retention of Volunteer Firefighters Activity**
   - The period of performance is between 12 and 48 months for all grants awarded under this activity.
   - A default 90-day recruitment period begins when FEMA approves the application for award. This period allows each recipient time to gather resources, initiate processes, and finalize contracts needed to implement SAFER grant activities before the start of the period of performance in order to maximize the funding's availability. However, the recipient can only expend funds within the period of performance.

- If a recipient is able to begin its recruitment or retention activities during the 90-day recruitment period, the period of performance may begin at that time. However, in these instances recipients must submit an amendment requesting that the period of performance start before the end of the 90-day recruitment period if they wish to begin the period early.
- The period of performance automatically starts after the 90-day recruitment period ends, regardless of whether the recipient has begun implementing its grant award. The period of performance cannot start later than 90 days after the award date.
- Extensions to the period of performance are not permitted, except in extenuating circumstances.

Administrative and National Policy Requirements

DHS Standard Administrative Terms and Conditions

All successful applicants for all DHS/FEMA grant and cooperative agreements are required to comply with DHS Standard Terms and Conditions, which are available online at https://www.dhs.gov/publication/fy15-dhs-standard-terms-and-conditions

The applicable DHS Standard Terms and Conditions will be those in effect at the time DHS/FEMA originally made the award.

Before accepting the award, the Authorized Organizational Representative (AOR) should carefully read the award package for instructions on administering the grant award and the terms and conditions associated with responsibilities under federal awards. Recipients must accept all conditions in this NOFO as well as any Special Terms and Conditions in the Notice of Award to receive an award under this program.

Financial and Programmatic Reporting

Recipients are required to submit various financial and programmatic reports as a condition of their award acceptances. FEMA may withhold future awards and funds drawdown if these reports are delinquent.

Federal Financial Reporting Requirements

Federal Financial Reports (SF-425)

Recipients of SAFER grants awarded on or after October 1, 2009, are required to submit semi-annual Federal Financial Reports (FFR) (SF-425) using the online eGrants system. These reports are based on the calendar year, and recipients must begin to submit reports in the period following the beginning of their period of performance. Recipients must submit FFRs throughout the entire period of performance of the grant. Reports are due no later than:

- **July 30** (for period January 1 – June 30)
- **January 30** (for period July 1 – December 31)

- Within 90 days after the end of the Period of Performance (regardless of when the period ends)

The Federal Financial Reporting Form (FFR) and corresponding instructions are available at https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html#sortby=1

Financial and Compliance Audit Report
Recipients that expend $750,000 or more from all federal funding sources during the non-federal entity's fiscal year must submit an organization-wide financial and compliance audit report. The audit must be performed in accordance with the requirements of the Government Accountability Office's (GAO) Government Auditing Standards, located at http://www.gao.gov/govaud/ybk01.htm, and the requirements of Subpart F of 2 C.F.R. Part 200, currently in effect at the time the award is made, currently located at http://www.ecfr.gov/cgi-bin/text-idx?SID=876f827f6fae2c4bce610e9427a6d229&node=sp2.1.200.f&rgn=div6.

Program Performance Reporting Requirements

Quarterly Performance Reports
SAFER grant recipients are responsible for submitting quarterly programmatic performance reports through the eGrants system. The programmatic performance report is due every three months, beginning three months after the start of the grant's period of performance, until the end of the period of performance.

Close Out Reporting Requirements
Within 90 days after the end of the period of performance, recipients must submit a final FFR (SF-425) and a final performance report (both within the closeout module in eGrants system) detailing all accomplishments and a qualitative summary of the impact of those accomplishments throughout the period of performance.

After FEMA reviews and approves these reports, FEMA will complete a close-out notice to close out the grant. The notice will indicate the period of performance as closed, list any remaining funds that will be deobligated, and address the requirement for recipients to maintain the grant records for three years from the date of the final FFR (SF-425).

The recipient is responsible for returning any funds that have been drawn down but remain unliquidated on recipient financial records.

Information on how to return funds to FEMA is available at http://www.fema.gov/media-library/assets/documents/31261?id=7080
Disclosing Information per 2 C.F.R. § 180.335

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

Monitoring
FEMA staff will periodically monitor recipients, both programmatically and financially, to ensure that the project goals, objectives, performance requirements, timelines, milestone completion, budgets, and other related program criteria are being met.

FEMA may accomplish this monitoring through either desk-based reviews, onsite monitoring visits, or both. Monitoring will involve the review and analysis of the financial, programmatic, performance, compliance and administrative processes, policies, activities, and other attributes of each federal assistance award, and it will identify areas where the recipient may need technical assistance, corrective actions, and/or other support.

The recipient is responsible for monitoring all sub-award activities to ensure compliance with federal and state laws, regulations, and guidance. Responsibilities include the accounting of receipts and expenditures, cash management, maintaining of adequate financial records, reporting and refunding expenditures disallowed by audits, monitoring, or other assessments and reviews.

G. DHS Awarding Agency Contact Information and Resource Information

Resources are available to:

- Guide applicants in completing SAFER Grant Applications; and
- Assist grant recipients with the programmatic and financial administration of an award.

SAFER Help Desk
The SAFER Help Desk provides technical assistance to applicants for the online completion and submission of applications into the eGrants system, answers questions concerning applicant eligibility and recipient responsibilities, and offers assistance in the programmatic administration of award. The Help Desk can be contacted at (866) 274-0960 or by email at FireGrants@fema.dhs.gov. Regular hours of operation are from 8:00 a.m. to 4:30 p.m., Monday through Friday. All times listed are Eastern Time.

eGrants System Information
For technical assistance with the eGrants system or SAFER application or award questions, please email the SAFER Help Desk at FireGrants@fema.dhs.gov. The Help Desk can also be contacted at (866) 274-0960. Regular hours of operation are also from 8:00 a.m. to 4:30 p.m. ET, Monday through Friday.

Environmental Planning and Historic Preservation (EHP)

- EHP Screening forms and instructions are available at http://www.fema.gov/media-library/assets/documents/90195
- SAFER recipients requiring EHP assistance should contact the GPD EHP Team at GPDEHPInfo@fema.dhs.gov.

H. Additional Information

Extensions to the Grant Period of Performance
Hiring of Firefighters Activity Grants
Extensions to the period of performance are not permitted.

Recruitment and Retention of Volunteer Firefighters Activity Grants
Extensions to the period of performance are generally not permitted, except in extenuating circumstances. **Approval is not guaranteed.**

FEMA will only consider extensions to the initial period of performance identified in the award through formal requests, via the eGrants system. Requests must contain a specific and compelling justification as to why an extension is required.

All extension requests must contain:

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

Requirements for Extension Consideration
To be eligible for consideration, recipients must submit extension requests via the eGrants system. Recipients can submit requests no earlier than 120 days but no later than 60 days prior to the end of the award's period of performance.

In accordance with FEMA policy, FEMA reviews extensions on a case-by-case basis and typically grants them for no more than a six-month period. FEMA will grant extension requests only due to compelling legal, policy, or operational challenges. The review process can take up to 30 days or longer. Applicants should factor this review period in to the timing of when to submit a request for an extension.

Example: Recipients may request an extension, when not adjusting the timeline for liquidating obligations would constitute a verifiable legal breach of contract by the recipient with vendors or sub-recipients or where a specific statute or regulation mandates an environmental review that cannot be completed within this timeframe or where other extenuating circumstances warrant a brief extension.

Appendix A: FY 2018 SAFER Program Updates

Appendix A contains detailed information on changes to SAFER between FY 2017 and FY 2018

I. New For FY 2018

- Applicants may now request to waive the position cost limit for new firefighters.
- Pursuant to IB 427, applicants must indicate when they apply for an award whether they are requesting a waiver and what requirement they seek to waive.
- The simplified acquisition threshold increased to $250,000.
- The definition of "new recruit."
- Updated prioritization and eligibility tables.

Appendix B – Programmatic Information and Priorities

Appendix B contains more detailed information on SAFER Program Information and Priorities. Reviewing this information may help applicants make their application(s) more competitive.

I. Application Instructions/Notes

Once the application has been submitted, it cannot be changed. There is *no appeal process* for inaccurate or incomplete information retained by the system due to improper or multiple browser usage by the applicant.

The primary point of contact listed in the application will receive an automatic eGrants notification email once the system receives the application.

Application Notes

- For the most competitive application, select those local need(s) that most closely align with the highest SAFER Grant Program priority(ies).
- When filling out the online application, applicants are required to provide basic demographic information regarding their department and the community served, but applicants must provide detailed information regarding the items or activities for which they are seeking funding.
- If awarded, FEMA may modify the application request(s) during the award review process; if the awarded activities, Scope of Work, or amount(s) do not match the application as submitted, the grant recipient shall only be responsible for completing the activities actually funded. The grant recipient is under no obligation to start, modify, or complete any activities requested but not funded by this award. Please review Award Package.

II. Supporting Definitions for this NOFO

Attrition: A gradual reduction in work force without laying off personnel, *e.g.*, when workers resign or retire and are not replaced.

Authority Having Jurisdiction (AHJ): (Per NFPA101-2015 Edition: Life Safety Code) is that person or office charged with enforcing the Life Safety Code.

Automatic Aid: Per NFPA 1710, 3.3.2.1 - 2010 edition and NFPA 1720 - 2009 is a plan developed between two or more fire departments for immediate joint response on first alarms.

Benefits: Includes regular compensation paid to employees during periods of authorized absences from the job, *e.g.*, vacation leave, sick leave, military leave. These costs are absorbed by all organization activities in proportion to the relative amount of time or effort actually devoted to each. Employer contributions or expenses for social security, employee insurance, workmen’s compensation, pension plan costs, and the like, whether treated as indirect costs or as direct costs, are also eligible and shall be distributed to particular awards and other activities in a manner consistent with the pattern of benefits accruing to the individuals or group of employees whose salaries and wages are chargeable. Please also reference 2 C.F.R. § 200.431 Compensation—fringe benefits.

Career Fire Department: A fire department that has an all-paid force of firefighting personnel other than paid-on-call firefighters (fire departments that provide reimbursement on a paid-on-call basis are considered to be a combination fire department for the purposes of this program).

Combination Fire Department: A fire department that has paid firefighting personnel and volunteer firefighting personnel. At minimum, a combination fire department must have at least one active firefighter who receives financial compensation for services (including paid-on-call) and at least one active firefighter who does not receive financial compensation for services, other than life, health, and workers' compensation insurance.

Emergency Medical Services Organization: A public or private organization that provides direct emergency medical services, including medical transport.

Fire Department: An agency or organization that has a formally recognized arrangement with a state, territory, local government, or tribal authority (city, county, parish, fire district, township, town, village, or other governing body) to provide fire suppression on a first-due basis to a fixed geographical area. Fire departments may be comprised of members who are volunteer, career, or a combination of volunteer and career.

Firefighter: An individual having the legal authority and responsibility to engage in fire suppression; employed by a fire department of a municipality, county, fire district, or state, engaged in the prevention, control, and extinguishing of fires; and/or responding to emergency situations in which life, property, or the environment is at risk. This individual must be trained in fire suppression, but may also be trained in emergency medical care, hazardous materials awareness, rescue techniques, and any other related duties provided by the fire department.

Formal Layoff Notice: Any layoff notice should align with the local rules and regulations that govern civil service employment in the jurisdiction. In order to be reasonable to employees, and to provide employees facing layoff actions a clear understanding of the impending action, any notice of layoff should be in writing and delivered to a specific employee affected by the action. The notice should identify a specific date employment will cease or specific event that would trigger the termination of employment. The notice should be delivered or otherwise presented directly to the affected employee in advance of the layoff action in accordance with the civil service provisions or union agreement in force in the jurisdiction taking action, *e.g.*, 60 days prior to the effective date of the layoff action. The notice should specify whether the action is permanent or temporary, as well as provide the anticipated schedule of layoffs. For the purposes of the SAFER Program, a notice that is not executed within the specified terms will be considered void unless an additional notice is provided within 14 days of the original action date.

Initial Full Alarm Assignment: Personnel, equipment, and resources ordinarily dispatched upon notification of a structural fire.

Majority Career: A department is considered majority career if 50 percent or more of the active firefighting membership is salaried staff.

Majority Volunteer: A department is considered majority volunteer if more than 50 percent of the active firefighting membership is NOT compensated for service other than a nominal stipend and/or insurance.

Mutual Aid: Per NFPA 1710, 3.3.2.1 - 2010 edition and NFPA1720 - 2009 is a written intergovernmental agreement between agencies and/or jurisdictions stating that they will assist one another on request by furnishing personnel, equipment, and/or expertise in a specified manner.

National, State, Local, or Federally Recognized Tribal Organizations that Represent the Interests of Volunteer Firefighters: Organizations that support or represent the interests of firefighters in front of legislative bodies at the local, state, tribal, and federal level. Such organizations include, but are not limited to, state or local firefighter and/or fire chiefs' associations, volunteer firefighter relief organizations, and associations. FEMA shall make the final determination as to whether an applicant is an appropriate volunteer firefighter interest group.

New Recruit: A new recruit is a firefighter that has joined after the department is notified of the grant award (the date of the award notification email in the eGrants mail center).

Nominal Stipend: A stipend is nominal if it does not exceed 20 percent of what the fire department would otherwise pay to hire a full-time firefighter to perform the services for which the stipend is provided. Whether a stipend falls above or below the 20 percent threshold may be determined in one of two ways. Departments that maintain paid full time firefighters on their payrolls may compare the stipend to the salary they pay a full time firefighter who performs similar services to determine whether the stipend is more or less than 20 percent of that salary. Departments that do not maintain full time firefighters on their payrolls may make the determination based on a comparison to the salary paid to a full time firefighter in a neighboring jurisdiction, elsewhere in the state or ultimately the nation, and may also utilize data from the Department of Labor's Bureau of Labor Statistics. A nominal stipend may also include reimbursements to volunteer firefighters for approximate out-of- pocket expenses they incur.

If a stipend paid exceeds 20 percent of the prevailing wage calculated as described above, then the firefighter receiving compensation would not qualify as a volunteer and is considered an employee who may be covered by the FLSA minimum wage and overtime provisions.

Operational Budget: The budget supporting fire-related programs and/or emergency response activities (*e.g.,* salaries, maintenance, equipment, apparatus).

Operational Position: A position with a primary assignment (more than 50 percent of time) on a fire suppression vehicle, regardless of collateral duties, in support of the department's NFPA 1710 or NFPA 1720 compliance.

Paid-on-Call: Firefighters who are paid a stipend for each event to which they respond. Paid-on-call firefighters may be considered paid firefighters or volunteer firefighters, depending on whether the stipend they receive is a nominal stipend. For the purposes of this SAFER Program, a department whose membership is comprised of all volunteer firefighters, including any paid-on-call firefighters who receive only a nominal stipend, will be considered a volunteer fire department. Also, for the purposes of this SAFER Program, a department whose membership is comprised of any paid-on-call firefighters who receive more than a nominal stipend will be considered a combination fire department. Also refer to the definition of a nominal stipend.

Part-Time Firefighter: A firefighter who works less than 40 hours per week. When more than one part-time firefighter shares a position that results in work in excess of 40 hours per week, FEMA considers that shared assignment to be a Full-Time Equivalent (FTE) position that must be accounted for in the staffing information provided in the application.

Salary: A fixed payment made by an employer to an employee to compensate for a regular work schedule. Typically the payment is made on a monthly, biweekly, or weekly basis but often expressed as an annual sum. *See also* 2 C.F.R. § 200.430 compensation—personal services. The salary structure should be documented in writing by the employer. Only costs for overtime that an employer routinely pays as a part of a firefighter's regularly scheduled and contracted shift hours to comply with the Fair Labor Standards Act (FLSA) are eligible salary costs under the Hiring of Firefighters Activity.

State: Any of the 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

Staffing and Deployment: The minimum staffing requirements to ensure a sufficient number of members are available to operate safely and effectively as defined in NFPA 1710 and 1720.

Supplanting: Replace or take place of funds that would otherwise be available from State or local sources, or the Bureau of Indian Affairs.

Volunteer Fire Department: A fire department that has an all-volunteer force of firefighting personnel. For a fire department to have an all-volunteer force, no member may receive financial compensation (in the form of salary or wages) for their services other than life and health insurance, workers' compensation insurance, and/or a nominal stipend per call. FEMA considers a department to be majority volunteer if more than 50 percent of its membership is made up of personnel who do not receive financial compensation for services.

III. Funding Limitations

Specific funding parameters are either required by law or are the outcome of recommendations from the Criteria Development Panel (CDP). Each requirement is identified below, followed by the source of the requirement which is noted in parentheses:

- 10 percent of the funding appropriated for FY 2018 SAFER awards is set aside for the recruitment and retention of volunteer firefighters. (15 U.S.C. § 2229a(a)(2)).
    - No more than 33 percent of the total amount allocated for the recruitment and retention of volunteers can be awarded to national, state, local, or federally recognized tribal organizations that represent the interests of volunteer firefighters. (CDP)
- 10 percent of the funding appropriated for FY 2018 SAFER awards is set aside for grants awarded to all volunteer or majority volunteer departments for hiring of firefighters. (15 U.S.C. § 2229a(a)(1)(H))
    - A majority volunteer fire department is made up of more than 50 percent of personnel who do not receive financial compensation for their services, other than life, health, and worker's compensation insurance, or a nominal stipend payment, including certain paid-on-call personnel. Although applications are normally awarded based on total score (high to low), in order to meet this 10 percent statutory set aside the SAFER Program Office may be required to fund an application which meets the criteria for the set aside instead of a higher-scoring application that does not meet the set aside criteria. (15 U.S.C. § 2229a(a)(1)(H))
    - If FEMA awards less than 10 percent of the funds available for the hiring of firefighters to volunteer and majority volunteer fire departments, it must transfer the remaining funds to provide grants for the recruitment and retention of volunteer firefighters. (15 U.S.C. § 2229a(a)(1)(H))

IV. Funding Priorities

Program Priorities Description

This section summarizes the program priorities used to determine grant awards. Program priorities are listed as High H, Medium M, or Low L. Within each identified program priority, all proposed activities have an equal value.

There are separate evaluation criteria for the following applications:

- Hiring of Firefighters
- Recruitment and Retention of Volunteer Firefighters – Fire Departments
- Recruitment and Retention of Volunteer Firefighters – National, State, Local, or Federally Recognized Tribal Volunteer Firefighter Interest Organizations

A. Hiring of Firefighters Activity

Grants awarded under the Hiring of Firefighters Activity enable volunteer, combination, and career fire departments to improve staffing levels to attain a more effective level of response and a safer incident scene. FEMA awards grants directly to volunteer, combination, and career fire departments to help fire departments increase their cadre of frontline firefighters. Hiring of Firefighter grants provide fire departments with funds to pay new firefighter salaries and benefits (exclusive of overtime). Automated (pre-score) evaluation scores represent 50 percent of the total application score.

1. Meeting the National Standards

FEMA prioritizes bringing non-compliant (NFPA 1710 or 1720) departments into compliance in the most cost-effective manner.

FEMA will ask applicants general questions about the NFPA standard they are attempting to meet as well as their current ability to meet that standard (without the use of overtime). FEMA will also ask applicants to indicate what their ability will be to meet that same standard if awarded grant funds.

Having additional firefighters on staff should improve a local fire department's ability to comply with the staffing, response, and operational standards that enhance community and firefighter safety.

Applications resulting in the largest percentage increases in compliance with the relevant section of NFPA 1710 (for career departments) or 1720 (for volunteer departments) receive higher consideration than applications resulting in smaller percentage increases in compliance.

Note: SAFER grants focus only on the Deployment or Staffing and Deployment sections of these two standards, respectively.

- NFPA 1710 Assembly Requirements: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Department (Section 5.2.4.1 – Single-Family Dwelling Initial Full Alarm Assignment Capability). This standard applies primarily to all-career fire departments and combination departments if the combination department chooses it.

- NFPA 1720 Assembly Requirements: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Volunteer Fire Departments (Section 4.3 – Staffing and Deployment). This standard applies primarily to all-volunteer fire departments, but it may also apply to combination departments if the combination department does not choose to comply with the NFPA 1710 standard.

National Fire Protection Association (NFPA) – “FREE ACCESS” - As part of its commitment to enhancing public safety and supporting the emergency responder, the NFPA makes its codes and standards available online for free. Please visit: http://www.nfpa.org/freeaccess

The tables below identify the priority levels for current and new compliance with the NFPA 1710/1720 standard.

Current (Pre-Award) 1710/1720 Compliance Priorities	
H Never or 0 percent	M Half the time or 40-59 percent
H Rarely or 1-19 percent	L Very often or 60-79 percent
M Sometimes or 20-39 percent	L Most of the time or 80-99 percent

New (Post-Award) 1710/1720 Compliance Priorities	
H Always or 100 percent	M Half the time or 40-59 percent
H Most of the time or 80-90 percent	L Sometimes or 20-39 percent
M Very often or 60-79 percent	L Rarely or 019 percent

2. **Call Volume and Population Served**
Department call volume and population served are both factors in the initial application evaluation. Departments responding to a higher number of incidents and departments who protect a larger jurisdiction will receive higher consideration than those departments responding to fewer incidents and protecting smaller jurisdictions.

3. **Firefighter Health Measures**
The health and well-being of firefighters is of paramount importance. Therefore, applicants who indicate newly recruited firefighters will undergo an entry-level physical and receive immunizations and who indicate they will provide annual medical exams receive higher consideration than applicants who do not specify that these benefits will be provided. To qualify for this higher consideration, the physicals must be consistent with those required under NFPA 1582 Chapter 6, Medical Evaluations of Candidates 6.1 and Chapter 9, Essential Job Tasks — Specific Evaluation of Medical Conditions in Members.

4. **Training Requirements**
Applicants will receive higher consideration if the personnel funded under the

grant will meet the minimum EMS training and certification requirements prescribed by the Authority Having Jurisdiction (AHJ).

B. Recruitment and Retention of Volunteer Firefighters Activity – Fire Departments

The purpose of these grants is to assist fire departments with the recruitment and retention of volunteer firefighters who are involved with or trained in the operations of firefighting and emergency response. The grants are intended to create a net increase in the number of trained, certified, and competent firefighters capable of safely responding to emergencies within the recipient's response area. The following identifies the elements that the applications will be evaluated on during the pre-scoring process. Automated (pre-score) evaluation scores represent 30 percent of the total application score.

1. **Meeting Staffing Standards**

   The highest priority is to assist departments experiencing a high rate of turnover and that have staffing levels significantly below the ideal staffing level required to comply with NFPA standards 1710 or 1720 (for details, see section A.1. Meeting the National Standards).

2. **Volunteer Membership**

   Departments or organizations with the highest percentage of volunteers should benefit the most from the recruitment and retention of volunteer firefighters. Therefore, applicants whose membership is comprised of mostly volunteer members, or have a significant number of volunteer firefighters, receive higher consideration.

Percentage of Volunteers	
H 91-100 percent	M 41-50 percent
H 81-91 percent	M 31-40 percent
H 71-80 percent	L 21-30 percent
H 61-70 percent	L 11-20 percent
M 51-60 percent	L 1-10 percent

3. **Call Volume**

   Department call volume is a factor in the initial evaluation. Departments responding to a higher number of incidents receive higher consideration.

4. **Firefighter Health Measures**

   Applicants who indicate the newly recruited firefighters will undergo an entry-level physical and receive immunizations and who indicate they will provide annual medical exams receive higher consideration. To qualify for this higher consideration, the physicals must be consistent with those required under NFPA 1582 Chapter 6, Medical Evaluations of Candidates 6.1 and Chapter 9, Essential Job Tasks — Specific Evaluation of Medical Conditions in Members.

Applicants who provide worker's compensation/Accidental Death & Dismemberment (AD&D) benefits to their members receive higher consideration than applicants who do not specify these benefits will be provided.

Entry-Level Medical Exams	
H NFPA 1582-compliant physicals	M Non-NFPA-compliant physicals

Annual Medical Exams	
H NFPA 1582-compliant physicals	M Non-NFPA-compliant physicals

5. **Firefighter Training and Certification Requirements**

Training and Certification	
H Both FF II/EMT	M FF I
H FF II	L First Responder
M Both FF I/EMT	

6. **Recruitment and Retention (R&R) Coordinator/Program Manager**

R&R Coordinator	
H Applicants who currently have a coordinator or program manager in place	L Applicants who do not have, or are not requesting, a coordinator/program manager
M Applicants who will request grant funding for a coordinator or program manager's position	

7. **Regional Requests**
Requests for recruitment or retention that will have a direct regional or local benefit beyond the immediate boundaries of the applicant's first-due area will

receive higher consideration. Direct benefit means that other fire departments will receive a portion of the grant awarded funds or the other departments will receive items purchased with the grant funds.

An eligible applicant, which can include a fire department, may act as a "host applicant" and apply for support of both a regional initiative and its own department's internal needs on one application. To apply for a regional project, the host fire department must agree, if awarded, to be responsible for all aspects of the grant. This includes, but is not limited to, accountability for the assets and all reporting requirements.

Regional host applicants and participating fire departments must execute a Memorandum of Understanding (MOU) or equivalent document, signed by all parties participating in the award, **prior** to submitting an application under the Regional Program activities. The agreement should specify the individual and mutual responsibilities of the participating partners, the participant's level of involvement in the project(s), the participating partners' EIN numbers, and the proposed distribution of all grant-funded assets or contracted services. Successful regional applicants shall provide a copy of the signed MOU at the time of award. Any entity named in the application as benefiting from the award shall be a party the MOU or equivalent document.

In completing the Request Details section of the application, the applicant must include a list of all participating fire departments, including a point of contact and phone number for each department that will directly benefit from the regional project if they receive the grant. The fire departments that will benefit from the recruitment and retention project may also apply for funding under SAFER as long as the departments do not apply for a project that could conflict with or duplicate the host applicant's project. Applicants must also certify that they will ensure the fire departments participating in this application have not received grants for similar items/activities.

All participants of a Regional application must be compliant with SAFER requirements, including being an eligible entity, and being current with past grants, closeouts, and other reporting requirements. The host shall not distribute grant-funded assets or provide grant-funded contractual services to non-compliant partner organizations.

Note: Only applications submitted under the Recruitment and Retention of Volunteer Firefighters Activity qualify for regional project requests. Regional projects are not eligible under the Hiring of Firefighters Activity.

C. Recruitment and Retention of Volunteer Firefighters Activity – National, State, Local, or Federally Recognized Tribal Volunteer Firefighter Interest Organizations

The purpose of these grants is to assist national, state, local, or federally recognized tribal organizations that represent the interests of volunteer firefighters with the recruitment and retention of volunteer firefighters who are involved with or trained in the operations of firefighting and emergency response. The grants are intended to create an aggregate increase in the number of trained, certified, and competent firefighters capable of safely responding to emergencies on behalf of the fire departments being represented. For this reason, projects that are comprehensive in nature and based on a clear needs assessment, implementation plan, evaluation plan, and have, or will establish, fire service partnerships will receive higher consideration.

In completing the Request Details and Narrative Statement sections of the application, the applicant must include data that approximates the characteristics of the entire region and/or all fire departments affected by the grant. If awarded, recipients may be required to provide documentation of each fire department's consent to participate in the application. Applicants must also certify that they will ensure the fire departments participating in this application have not received grants for similar items/activities. The following identifies the elements that the applications will be evaluated on during the pre-scoring process. Automated (pre-score) evaluation scores represent 30 percent of the total application score.

1. **Meeting Staffing Standards**
   The goal under this SAFER activity is to assist departments experiencing a high rate of turnover that have staffing levels significantly below the ideal staffing level required to comply with NFPA standards 1710 or 1720 (for details, see section A.1. Meeting the National Standards). Organizations that currently have the lowest recruitment and retention rates among the entire region and/or all fire departments benefiting from the grant funds receive higher consideration for funding.

2. **Recruitment and Retention (R&R) Coordinator/Program Manager**

R&R Coordinator	
H Applicants who currently have a coordinator or program manager in place	L Applicants who do not have, or are not requesting, a coordinator or program manager
M Applicants who will request grant funding for a coordinator or program manager's position	

3. Needs Assessment

Needs Assessment	
H Applicants with projects based on a needs assessment	L Applicants with projects that are not based on a needs assessment

4. Fire Service Partnerships

Fire Service Partnerships	
H Applicants who have, or will establish, fire service partnerships as part of this project	L Applicants who will not have, or establish, fire service partnerships as part of this project

V. Eligible and Ineligible Costs

Regardless of the eligibility of any costs requested or the results of the review of the application conducted in accordance with Section E of this NOFO, FEMA reserves the right to approve the activities requested in an application in whole or in part.

Hiring of Firefighters Activity – Eligible Costs
• Funds may only be used to hire new, additional firefighters or changing the status of part-time or paid-on-call firefighters to full-time firefighters and shall not be used to supplant funds. • SAFER grant funds must be used to increase the amount of funds that would, in the absence of federal funds received under this grant, be made available from state or local sources, or in the case of Indian tribal governments, from funds provided by the Bureau of Indian Affairs. Recipients may apply for a waiver of this restriction on supplanting. • Salary and associated benefits (actual payroll expenses) for the positions funded under the SAFER grant are eligible. Costs are reimbursable if they are included as part of the standard package, available to all operational firefighter positions, and contractually obligated. Refer also to the definitions in Section II of this Appendix. • Only full-time positions are eligible for funding. A full-time position is one position that is funded for at least 2,080 hours per year, *e.g.*, 40 hours per week, 52 weeks per year. However, recognizing many departments have shifts exceeding a 40-hour workweek, FEMA also will consider funding the job-sharing of a full-time position if the grant recipient has sufficient justification. A job-share position is a full-time position occupied by more than one person. Example: A department may hire two part-time staff persons at 28 hours each to fulfill the scheduled work hours of one 56-hour shift position. • Salaries and benefits of firefighters hired under SAFER funding while they are engaged in initial recruit training are eligible. • Costs for overtime that fire departments routinely pay as a part of the firefighter's regularly scheduled and contracted shift hours to comply with the Fair Labor Standards Act (FLSA) are eligible.

Hiring of Firefighters Activity – Eligible Costs
• SAFER grant funds will only pay for operational positions whose primary assignment (more than 50 percent of time) is on a fire suppression vehicle, regardless of collateral duties. • Volunteer and mostly volunteer fire departments may also hire individuals to fill officer-level positions (*e.g.*, chief, fire inspector, training officer, safety officer) in addition to their primary operational assignment.

Hiring of Firefighters Activity – Ineligible Costs
• The salaries and benefits of full-time firefighters who are employees at the time of grant award are ineligible to be funded under this grant. • The SAFER grant may not be used to fund promotions (*e.g.*, to pay a current member a higher salary by placing him/her in a new SAFER-funded position). • Pre-application costs, such as grant writer fees, administrative costs (*e.g.*, physicals/medical exams, background checks, etc.), and indirect costs associated with hiring firefighters are ineligible. • Costs to train and equip firefighters (*e.g.*, Personal Protective Equipment (PPE)/Turnout Gear) are ineligible (this does not include the salaries and benefits of firefighters hired under SAFER while they are engaged in training). • Costs for uniform allowances that are not contractually obligated, included as part of the standard benefits package for all employees, or reimbursed via payroll are ineligible. • Costs of annual physicals/medical exams are ineligible Overtime costs are ineligible (except as noted in "eligible costs" above). • Management and Administrative (M&A) costs.

Recruitment and Retention of Volunteer Firefighters Activity – Eligible Costs
Overview Applicants must correlate the activities for which funding is requested and the identified recruitment or retention problems or issues to be addressed. FEMA will not fund a budget line item if an applicant does not provide sufficient information detailing how it will enhance recruitment and retention. Applicants who propose to focus on retention of volunteers will receive equal consideration as applicants focusing on recruitment of volunteers. A focus on retention may include providing incentives for volunteer firefighter members to continue service in a fire department. SAFER grant funds may only be used for volunteer firefighters who are involved with, or trained in, the operations of firefighting and emergency response. FEMA recommends that departments consult their Authority Having Jurisdiction (AHJ) or the department's legal counsel to understand the full legal and financial implications involved with implementing or sustaining programs that offer benefits or financial awards to firefighters (*e.g.*, stipends, Length of Service Award Program [LOSAP]). All grant-related purchases and activities must be incurred, received, and completed within the period of performance. The period of coverage and/or service delivery on all contracts, and agreements may not begin prior to/extend beyond the period of performance of the grant.

Recruitment and Retention of Volunteer Firefighters Activity – Eligible Costs

All funded activities under Recruitment and Retention must be governed by formally adopted Standard Operating Procedures (SOPs). Minimally, these SOPs should specify who qualifies for each of the incentives, specific requirements for earning the incentives, and the disposition of the awarded incentives if an individual fails to fulfill the stipulations. FEMA may ask for copies of SOPs prior to, or after being awarded.

FEMA will not fund any projects, activities, or line items that are covered under a department's normal operating budget. Federal funding may not be used to supplant (*i.e.*, replace) an existing activity or program.

Applicants should use the Request Details portion of the grant application to provide detailed information on how each proposed cost was determined or calculated. As much as possible, costs should be based on reliable market research (for example, earnings information is published by the U.S. Bureau of Labor Statistics). The costs may also be justified in the Narrative Statement section. Applications for funding in the Recruitment and Retention of Volunteer Firefighters Activity could include projects requiring up to four years to complete (with proper justification).

Recruitment and Retention of Volunteer Firefighters Activity – Eligible High Priority Costs

High Priority

- Costs to support a staffing needs assessment identifying the operational staff that are required to carry out fire department responsibilities safely and effectively (*e.g.*, supplies for data collection, contractors or personnel to collect and analyze data, software programs, etc.).
    - NOTE: If a staffing needs assessment is requested and the application is selected for funding, the staffing needs assessment will be the only activity that will be funded.
- Costs to support a Recruitment and/or Retention Coordinator, a Program Manager, and/or a Grant Administrator (including reasonable salary, fringe benefits, contract support, supplies, travel, etc.).
    - NOTE: Computers for these positions are low priority items.
- Marketing Program to recruit new volunteer firefighters, such as:
    - Media advertising (*e.g.*, television, radio, social media)
    - Print advertising (*e.g.*, newspapers, billboards, signs, banners, brochures, flyers)
    - LED/electronic sign (NOTE: This is a high priority item only when included as part of a comprehensive marketing program. Only one LED/electronic sign is allowed per applicant and 75 percent of usage must be dedicated to Recruitment and Retention activities – additional restrictions apply; *see* Section D: Application and Submission Information - Environmental Planning and Historic Preservation [EHP]).
    - NOTE: If requesting funds to recruit new members, a marketing plan must currently be in place or the application must be requesting funds to create a marketing program.
- New Member Costs - Only one entry-level physical per new recruit. Physicals for existing members are not eligible. All grant-funded physicals (except those for explorers) must meet NFPA 1582 standards (Chapter 6, Medical Evaluations of Candidates 6.1 and Chapter 9, Essential Job Tasks — Specific Evaluation of Medical Conditions in Members). The cost of physicals should be based on local physician or health center prices. Detailed information on implementing NFPA 1582 physicals can be found at https://www.fstaresearch.org/roadmap.

Recruitment and Retention of Volunteer Firefighters Activity – Eligible High Priority Costs
- NOTE: Annual physicals are eligible if the applicant is also requesting grant funds for NFPA 1582 entry-level physicals for new recruits. Annual Physicals are only eligible for the same new recruits; physicals or annual exams for any other member are not eligible.   - New recruit basic training that is not covered under a department's normal operating budget and as required by the Authority Having Jurisdiction (AHJ) to meet minimum firefighter certification (*e.g.*, CPR, First Responder, EMT, Firefighter 1, Firefighter 2).   - Reimbursement to members for lost wages, mileage/transportation, lodging, and/or per diem while attending required basic training are also eligible. Note that costs for mileage/transportation, lodging, and per diem must comply with the department's written travel policies and procedures. If policies are not established, costs will only be reimbursed at the Federal Government rate.   - Leadership/career development training when used as a retention incentive that is not covered under a department's normal operating budget.   - Reimbursement to members for lost wages, mileage/transportation, lodging, and/or per diem while attending leadership/career development training or conferences are also eligible.   - NOTE: Costs for mileage/transportation, lodging, and per diem must comply with the department's written travel policies and procedures. If policies are not established, costs will only be reimbursed at the Federal Government rate.   - Courses must provide continuing education units (CEUs) or certificates of completion to be eligible.   - Instructor/train-the-trainer training that is not covered under a department's normal operating budget.   - Reimbursement to members for lost wages, mileage/transportation, lodging, and/or per diem while attending instructor/train-the-trainer training are also eligible.   - NOTE: Costs for mileage/transportation, lodging, and per diem must comply with the department's written travel policies and procedures. If policies are not established, costs will only be reimbursed at the Federal Government rate.   - Tuition assistance for higher education (including books, lab fees, and student fees).   - Coursework or certifications in this category should be more advanced than what departments typically fund for required minimum-staffing requirements.   - Courses are not limited to firefighter training or education.   - Computers for individual students are not eligible for funding.   - Payments for student loans are not eligible for funding.   - Only tuition payments for classes offered and taken during the period of performance are allowable.   - Personal Protective Equipment (PPE)/Turnout Gear.   - PPE may only be funded for new firefighters that are recruited after the date of grant award, that successfully pass an NFPA 1582 compliant physical, and that are certified as "fit for duty." PPE purchased with SAFER grant funding must be utilized by adequately trained staff.   - Funds are available to acquire OSHA-required and NFPA-compliant PPE for firefighting personnel. In addition, PPE must meet any national or state standards and increase firefighter safety. Failure to meet these requirements may result in

Recruitment and Retention of Volunteer Firefighters Activity – Eligible High Priority Costs
ineligibility for PPE funding. Copies of NFPA standards may be reviewed at http://www.nfpa.org/. o Only actual costs for PPE are allowed and will be paid on a reimbursable basis. Allowable costs may be limited to reasonable amounts, as determined by FEMA. o To receive reimbursement, recipients must provide the following documentation to support the purchase of PPE: ▪ Invoices/proof of payment for PPE. ▪ Proof that the firefighter(s) have passed an NFPA 1582 compliant physical and are certified as "fit for duty." o Eligible PPE Expenditures: ▪ One set of PPE for structural or wildland firefighting per new recruit. ▪ SAFER considers a complete set of structural PPE to be comprised of one SCBA mask/face piece, one pair of pants, one coat, one helmet, two hoods, one pair of boots, two pairs of gloves, one pair of suspenders, and one pair of goggles. In those jurisdictions where additional PPE, like Personal Safety/Rescue Bailout Systems are statutorily required, SAFER will consider all statutorily required items to be part of a complete PPE set. ▪ SAFER considers a complete set of wildland PPE to be comprised of: one pair of pants, one coat, one jumpsuit, one helmet, one pair of boots, one pair of gloves, one pair of suspenders, one pair of goggles, one fire shelter, one web gear, one backpack, and one canteen/hydration system. ▪ American National Standards Institute (ANSI)-approved retro-reflective highway apparel.

Recruitment and Retention of Volunteer Firefighters Activity – Eligible Medium Priority Costs
Medium Priority • Nominal stipends for volunteer firefighters who are involved with, or trained in, the operations of firefighting and emergency response (*e.g.*, Pay-per-Call, Points Based System, etc.). Stipends may only be provided for participation in operational (firefighting) activities, such as duty shifts, operational training, and/or responding to incidents. • Costs to support explorer, cadet, and mentoring programs, such as: o One set of station duty uniforms (SAFER considers one set of station duty uniform as one pair of pants, one shirt, one hat, and one pair of boots) for newly recruited cadets/explorers. o Training (Non-Immediate Danger to Life and Health or IDLH). o One set of structural or wildland PPE, for newly recruited cadets/explorers as defined above, with the following two exceptions: 1) SCBA mask/face pieces are not eligible because PPE for explorers/cadets may not be used in an IDLH atmosphere, and 2) physicals for explorers/cadets are not required to meet NFPA 1582. o One introductory physical exam per newly recruited explorer/cadet. • New Length of Service Award Programs (LOSAP) or Retirement Program. • Insurance packages (*e.g.*, Accidental Death and Dismemberment (AD&D), workers compensation, disability, health, dental, life). • Exercise equipment and gym memberships limited to no more than $10,000 (total per grant award).

Recruitment and Retention of Volunteer Firefighters Activity – Eligible Low Priority Costs

Low Priority
• New Member Costs - One set of station duty uniforms for each new recruit only (SAFER considers one set of station duty uniform as one pair of pants, one shirt, one hat, and one pair of boots) per the departments uniform policy.
• Costs for advanced training not currently covered under the department's operating budget (*e.g.*, extrication training, specialized equipment training, swift water rescue, etc.). Advanced training requests are only eligible for members who have already met the minimum firefighter certifications required by the Authority Having Jurisdiction (AHJ) and must closely correlate to the applicant's recruitment and/or retention goals.
    ○ Reimbursement to members for lost wages, mileage/transportation, lodging, and/or per diem while attending advanced training are also eligible.
    ○ NOTE: Costs for mileage/transportation, lodging, and per diem must comply with the department's written travel policies and procedures. If policies are not established, costs will only be reimbursed at the Federal Government rate.
• Single computer or printer for Recruitment and/or Retention Coordinator, Program Manager, and/or Grant Administrator.
• Awards/Incentive program for participation in operational (firefighting) activities, such as operational training and/or responding to incidents (*e.g.*, length of service plaques, gift cards for top responders, non-uniform clothing).
    ○ Non-uniform clothing (limited to shirts, jackets, or pullovers) as part of an award program only.
• LED/electronic sign when it is not included as part of a comprehensive marketing program.
• Fire service association membership fees.
• Projector and/or screen to support classroom training.
• Payments for housing or rent for volunteers at or near the fire station.
• Other costs associated with new recruits (background checks, aptitude tests, etc.)
• Station Modifications/Remodeling/Renovation of Existing Facilities.
    ○ Remodeling/renovations to an existing facility are allowable (*e.g.*, converting space into bunkroom). The renovations must be minor interior alterations not to exceed $10,000 (total per grant award).
    ○ Remodeling/renovations may not change the footprint or profile of the building.
    ○ Any request for modifications to facilities may require Environmental and Historic Preservation (EHP) review (see Section D: Application and Submission Information - Environmental Planning and Historic Preservation [EHP]). Recipients are encouraged to have completed as many steps as possible for a successful EHP Review in support of their proposal for funding (the steps include: coordination with their State Historic Preservation Office to identify potential historic preservation issues and to discuss the potential for project effects; compliance with all state and EHP laws and requirements).
    ○ Written approval must be provided by FEMA prior to the use of any SAFER Funds for remodeling or renovation. If awarded funds for remodeling or renovation, recipients may be required to submit evidence of approved zoning ordinances, architectural plans, any other locally required planning permits, and a notice of interest.

Recruitment and Retention of Volunteer Firefighters Activity – Eligible Non-Prioritized Costs
Non-prioritized Costs • Management and Administrative (M&A) costs up to three percent of the total awarded amount in accordance with 2 C.F.R. Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Administrative costs must be identifiable and directly related to the implementation and management of the SAFER grant program. Salaries and fringe benefits for personnel directly supporting the grant are not required to be included in the M&A budget line item. • Indirect costs for national, state, local, or federally recognized tribal volunteer firefighter interest organizations that are expended pursuant to Section D: Application and Submission Information – Indirect Costs. Recipients must have an approved indirect cost rate agreement with their cognizant federal agency. • Up to $1,500 in grant writer fees for application preparation, but not grant administration. The fee must have been paid within 30 days of the end of the application period and prior to any contact with SAFER Program Office staff or an Offer of Award (see Appendix C: Award Administration Information, Section I. Grant Writer/Preparation Fees). • Audit costs proportional to the total SAFER grant award. Recipients of multiple federal funding sources can only charge a pro rata share of the audit cost(s) to the SAFER Award.

Recruitment and Retention of Volunteer Firefighters Activity – Ineligible Costs
• Salary and benefits for firefighters. • Retroactive payments or recognition for operational services rendered prior to the grant award are ineligible. • Costs incurred outside of the period of performance except for grant writer fees; see Appendix C: Award Administration Information, Section I. Grant Writer/Preparation Fees • Fire suppression equipment. • Vehicles. • Fire simulators, fire evolution, or fire training props (*e.g.*, burn trailers, forcible entry, rescue/smoke maze, flashover simulators). • Sirens, warning lights for fire department or private vehicles, or other outdoor warning devices. • Communication equipment including cell phones, pagers, portable radios, or Computer-Aided Dispatch (CAD) systems. • Video cameras/recording equipment. • Retroactive payments or recognition for non-operational activities (including payments, gift cards, recruitment bonuses, or stipends for recruiting firefighters). • Payments for travel to, or participation in leisure or social activities such as theatre tickets, entertainment tickets, and trips (*e.g.*, professional sporting events). • Costs associated with award banquets, such as food, photographers, refreshments, entertainment, or rental facilities. Reimbursement for actual awards (*e.g.*, plaques and trophies) is eligible. • Costs for food or refreshments that are not part of a conference or training hosted by the grant recipient.

Recruitment and Retention of Volunteer Firefighters Activity – Ineligible Costs

• Costs for training currently covered under the department's operating budget (*e.g.*, tuition or instructor fees for department-mandated, basic-level training).
• Services at a member's personal residence (*e.g.*, internet access, plowing of driveways)
• Furniture (except for newly converted bunkrooms), televisions, fixtures, appliances (*e.g.*, refrigerators), and entertainment equipment.
• "Giveaways," such as pencils, pens, t-shirts, cups, mugs, or balloons, for recruitment events.
• Fees for courses and training that are available free of charge on the internet or at state/local training facilities (*e.g.*, NIMS 100, 700, 800).
• Costs for fuel. Costs for travel to training or other eligible activities are reimbursed through mileage rates.
• Annual medical exams for existing members.
• Payments for student loans.
• Mileage reimbursement for responding to incidents or periodic operational training at the fire house (mileage reimbursement is allowed for other types of training as explained under eligible costs)
• Station internet access/user fees and equipment to install internet (such as routers)
• Continued funding of a Length of Service Award Programs (LOSAP) or Retirement Program
• Computers in common areas or individual computers for training/education
• Copiers/printers
• Incentives for career firefighters within the recipient's fire department
• Additional ineligible costs for Explorer/Cadet/Mentoring Programs:
    ○ SCBA, including mask/face piece
    ○ Anything involving the IDLH atmosphere
    ○ Any activities precluded by the authority having jurisdiction
• Ineligible PPE expenditures:
    ○ Three-quarter length rubber boots
    ○ Self-Contained Breathing Apparatus (SCBAs) (not including SCBA masks/face pieces)
    ○ PASS Devices
    ○ Spare cylinders
    ○ Bomb disposal suits
    ○ PPE for hazardous materials and other specialized incidents
    ○ More than one set of PPE per member
    ○ PPE for existing members
• This list of ineligible costs is not exhaustive.

Appendix C: Award Administration Information

Appendix C contains detailed information on SAFER Award Administration. Reviewing this information may help grant recipients in the programmatic and financial administration of their award(s).

Help FEMA Prevent Fraud, Waste, and Abuse

If applicants or recipients have information about instances of fraud, waste, abuse, or mismanagement involving FEMA programs or operations, they should contact the DHS OIG Hotline at (800) 323-8603, by fax at (202) 254-4297, or email DHSOIGHOTLlNE@dhs.gov

I. Economic Hardship Waivers of Cost Share, Minimum Budget, and Supplanting Requirements for the SAFER Grant Program

In cases of demonstrated economic hardship, and upon the request of the recipient, the Administrator may waive or reduce a SAFER cost share, position cost limit, minimum budget, or supplanting requirement for certain recipients (15 U.S.C. § 2229(k)(4)(A)). As required by statute, the Administrator of FEMA will establish guidelines for determining what constitutes economic hardship and will publish these guidelines at FEMA's website https://www.fema.gov/media-library/assets/documents/158776.

FEMA has issued Information Bulletin No. 427, Economic Hardship Waivers: AFG Grant Program, FP&S Grant Program, and SAFER Grant Program. SAFER applicants for FY 2018 must indicate at the time of application for the grant whether they are requesting a waiver and whether they want FEMA to waive the cost share requirement, the position cost limit requirement, the minimum budget requirement, the supplanting requirement, or any combination of these requirements.

SAFER Hiring of Firefighter Activity grant recipients may apply for one, two, three, or all four of the available waivers.

SAFER Recruitment and Retention of Volunteer Firefighters Activity grant applicants may only apply to waive or reduce the minimum budget requirement.

Applicants must indicate their interest in applying for a hardship waiver within the application via the online eGrants system and must attach the waiver request to their applications.

II. Grant Writer/Preparation Fees (Recruitment and Retention of Volunteer Firefighters Activity Only)

Applicants under the Recruitment and Retention of Volunteer Firefighters Activity may hire and reimburse a grant writer to assist in the application process.

Fees for grant writers may be included as a pre-award expenditure, but payment of the grant writer fees cannot be contingent on the applicant receiving an award. For grant writer fees to be eligible as a pre-award expenditure, applicants must specifically identify and list the fees in the Request Details section of the application. FEMA will only consider reimbursements for application preparation, but not administration, up to but not more than $1,500. Pursuant to 2 C.F.R. Part 180, recipients may not use federal grant funds to reimburse any entity, including a grant writer or preparer, if that entity is presently suspended or debarred by the Federal Government from receiving funding under federally funded grants or contracts. Recipients must verify that the contractor is not suspended or debarred from participating in specified federal procurement or non-procurement transactions pursuant to 2 C.F.R. § 180.300. FEMA recommends recipients use SAM.gov to conduct this verification.

Additionally, regardless of whether the recipient requests grant writer fees, Federal funds and funds applied toward the award's cost share cannot be used to pay a grant writer to provide post-award services unless a single contract covering both pre- and post-award services was awarded to the grant writer and procured in compliance with 2 C.F.R. §§ 200.317-326.

By submitting an application, applicants certify that all of the information contained therein is true and an accurate reflection of the organization. Regardless of the applicant's intent, the submission of information that is false or misleading may result in actions by FEMA that include but are not limited to: not considering the submitted application for award, temporarily withholding funding under the existing award pending investigation, or referring the matter to the Office of the Inspector General.

Prior to submitting the application, please review all work produced by grant writers or other third parties for accuracy. In addition, the fees must have been paid within 30 days of the end of the application period and prior to any contact with SAFER Program Office staff or an offer of award. The applicant must provide the following documentation upon request:

- A copy of the grant writer's contract for services
- A copy of the invoice or purchase order
- A copy of the canceled check (front and back) and bank statement

Applicants will be required to provide documentation to support these pre-award expenditures. Failure to provide the requested documentation may result in the grant writer fee being deemed ineligible and the grant reduced accordingly.

NOTE: FEMA requires that all grant writer or preparer information must be entered into the Overview section of the SAFER application, whether that person, entity, or agent is compensated or not.

III. Maintenance and Sustainment for SAFER Programs

The use of FEMA preparedness grant funds, to include the SAFER Program, for the costs of repairs or replacement, as well as maintenance contracts, warranties, and user fees may be allowable.

The intent of eligible Maintenance and Sustainment activities is to provide direct support to the critical capabilities developed using FEMA and other DHS grants and support activities. Routine upkeep and the supplies, expendables, or one-time use items that support routine upkeep (e.g. gasoline, tire replacement, routine oil changes, monthly inspections, or grounds and facility maintenance) are the responsibility of the recipient and may not be funded with SAFER funding.

Generally, when purchasing a maintenance agreement, service contract, or extended warranty for systems or equipment, the period of coverage provided under such a plan may not extend beyond the period of performance of the grant with which the agreement, warranty, or contract is purchased.

However, only if the maintenance contract or extended warranty is purchased incidental to the original purchase of the system or equipment, recipients may procure maintenance or warranty coverage which exceeds the period of performance, as explained in FEMA Policy 205-402-125-1, available at http://www.fema.gov/media-library-data/20130726-1915-25045-9444/gpd_maintenance_policy.pdf.

The duration of an extended warranty purchased incidental to the original purchase of the equipment may exceed the period performance as long as the coverage purchased is consistent with that which is typically provided for, or available through, these types of agreements, warranties, or contracts. When purchasing a stand-alone warranty, or extending an existing maintenance contract on an already-owned piece of equipment or system, coverage purchased may not exceed the period of performance of the award used to purchase the maintenance agreement or warranty. As with warranties and maintenance agreements, this policy extends to licenses and user fees as well.

Even if purchased incidental to the original purchase of the equipment, the duration of an extended maintenance agreement or warranty must also be reasonable for the type of equipment or system being purchased. For example, if a vendor offers a 10-year extended warranty incidental to the purchase of a piece of equipment, but the useful life of that equipment being purchased is five years, the purchase of a 10-year extended warranty would not be a reasonable cost and may not be charged to the grant.

IV. Taxes, Fees, Levies and Assessments

Taxes, fees, levies, or assessments that the recipient is legally required to pay and is directly related to any eligible SAFER program acquisition activity may be charged to an SAFER award pursuant to 2 C.F.R. § 200.470. These charges shall be identified and enumerated in the application's Narrative and the Request Details section of the acquisition activity.

Any avoidable and unreasonable costs that result from the action or inaction of a recipient (or recipient's agent), or that prevent that recipient from enjoying any lawful exemption, waiver, or reduction of any tax, fee, levy, or assessment directly related to any eligible SAFER Program acquisition activity, are not chargeable to any SAFER Award.

Example: Government entities and Public Safety Agencies are exempt from some Federal Communications Commission (FCC) fees, but only if the eligible organization submits an exemption or waiver request to the FCC.

Government entities are not required to pay FCC regulatory fees. Non-profit entities (exempt under Section 501 of the Internal Revenue Code) also may be exempt. The FCC requires that any entity claiming exempt status submit, or have on file with the FCC a valid IRS Determination Letter documenting its nonprofit status or certification from a governmental authority attesting to its exempt status. For more information, please visit http://www.fcc.gov/.

V. Procurement Integrity

Through audits conducted by DHS Office of Inspector General (OIG) and FEMA grant monitoring, findings have shown that some FEMA recipients have not adhered fully to proper procurement requirements when spending grant funds. Anything less than full compliance with federal procurement policies jeopardizes the integrity of the grant as well as the grant program. Noncompliance with the federal procurement rules may result in FEMA imposing specific award conditions as described in 2 C.F.R. § 200.207 or pursuing other remedies for noncompliance under 2 C.F.R. § 200.338.

The below highlights the federal procurement requirements for FEMA recipients when procuring goods and services with federal grant funds. DHS/FEMA will include a review of recipients' procurement practices as part of the normal monitoring activities. **All procurement activity must be conducted in compliance with federal procurement standards at 2 C.F.R. §§ 200.317 – 200.326.**[1] Select requirements under these standards are listed below, but recipients must comply with all requirements, even if they are not listed below.

[1] However, the simplified acquisition threshold laid out under the relevant regulations has increased to $250,000. *See* Section 805 of the *National Defense Authorization Act for Fiscal Year 2008*, Pub. L. 115-41; Office of Mgmt. & Budget, M-18-18: Mem. for Chief Fin. Officers & Heads of Small Exec. Agencies (June 20, 2018), at https://www.whitehouse.gov/wp-content/uploads/2018/06/M-18-18.pdf; Grants Programs Directorate, Information Bulletin No. 434: Increases and Changes to the Micro-Purchase and Simplified Acquisition Thresholds (Aug. 28, 2018), at https://www.fema.gov/media-library-data/1535477410796-10abe5c8fc5bb73f170e3025c6fbfc6a/IB_Changes_to_the_Micro_Purch_and_Simp_Acquisition_Thresholds_signed_508.pdf.

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

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

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

Under this prohibition, unless the non-federal entity solicits for and awards a contract covering both development and execution of specifications (or similar elements as described above), and it procured this contract in compliance with 2 C.F.R. §§ 200.317 – 200.326, federal funds and funds applied to the award's cost share cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of these specifications. This rule applies to all contracts funded with federal grant funds, including pre-award costs such as grant writer fees as well as post-award costs such as grant management fees. For more information on grant writer and grant management costs, *see* Appendix C – Award Administration information, Section II. Grant Writer/Preparation Fees.

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

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

procurement.

- Any arbitrary action in the procurement process.

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

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

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

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

Supply Schedules

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

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

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

If a non-federal entity other than a state seeks to use such a state supply schedule, cooperative purchasing program, or other similar type of arrangement, FEMA recommends that the recipient first discuss the procurement plans with the FEMA Grant Programs Directorate.

Documentation

Non-federal entities are required to maintain and retain the following documentation for federally funded or cost-match purchases:

- Backup documentation, such as bids and quotes.
- Cost/price analyses on file for review by federal personnel, if applicable.
- Specifications
- Solicitations
- Competitive quotes or proposals
- Basis for selection decisions
- Purchase orders
- Contracts
- Invoices
- Cancelled checks
- Other documents required by federal regulations applicable at the time a grant is

awarded to a recipient.

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

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

Pursuant to 2 C.F.R. § 200.313(a)(2), recipients may not encumber equipment procured with SAFER funding without FEMA or pass-through entity approval.

VI. Payments and Amendments

Payments
SAFER payment/drawdown requests are generated using the eGrants system and are governed by applicable federal regulations, including 2 C.F.R. § 200.305.

Recipients should not expend funds or request drawdowns until all special conditions listed on the grant award document are met and FEMA has approved the request for payment in the eGrants system.

Recipients should draw down funds based upon immediate disbursement requirements; however, FEMA strongly encourages recipients to draw down funds as close to disbursement or expenditure as possible to avoid accruing interest.

Advances
Recipients shall be paid in advance, provided they maintain or demonstrate the willingness and ability to maintain procedures to minimize the time elapsing between the transfer of the funds and their disbursement by the recipient, and financial management systems that meet the standards for fund control and accountability as established in 2 C.F.R. Part 200.

Although advance drawdown requests are permissible, recipients remain subject to applicable federal law in effect at the time the grant is awarded. Governing interest requirements include the Uniform Administrative Requirements Cost Principles, and Audit Requirements for Federal Awards at 2 C.F.R. Part 200 and the Cash Management Improvement Act (CMIA) and its implementing regulations at 31 C.F.R. Part 205. Interest under CMIA will accrue from the time federal funds are credited to a recipient's account until the time the recipient pays out the funds for program purposes.

Recipients must follow applicable federal regulations governing interest earned on payment advances in effect at the time a grant is awarded to the recipient, including 2 C.F.R. § 200.305.

Reimbursement

Reimbursement of the recipient is the preferred method of payment under the grant award when the 2 C.F.R. § 200.305(b)(1)-(2) requirements to be paid in advance cannot be met. *See* 2 C.F.R. § 200.305(b)(3). In accordance with U.S. Department of Treasury regulations at 31 C.F.R. Part 205, if applicable, recipients must maintain procedures to minimize the time elapsing between the transfer of funds and the disbursement of these funds.

Program Income, Rebates, and Other Revenue

Recipients must disburse program income, rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments, in accordance with applicable federal regulations at 2 C.F.R. Part 200.

The reduction of federal financial participation via rebates/refunds *may* generate excess funds for the recipient, if the recipient had already obligated its cost-share match based upon the original award figures.

If the recipient had *already* obligated its original cost share *prior* to the rebate, then the recipient *may* have minimum excess funds equal to the difference between the original cost share and the rebate adjusted cost share.

Payment Requests During Closeout

For the 90 days following the end of the period of performance, during an award's closeout reconciliation, recipients may only submit reimbursement payment requests.

Reimbursement payment requests can <u>only</u> be for obligations that were obligated and received within the award's active period of performance. Reimbursement requests should contain clear and specific information certifying that the liquidation of federal funds will be reimbursement for an obligation properly incurred during the active period of performance. FEMA also may request documentation supporting the reimbursement for review.

Amendments

FEMA may approve SAFER award amendments on a case-by-case basis for the following reasons:

- Extension of the period of performance to complete the scope of work under the Recruitment and Retention of Volunteer Firefighters Activity
- Changes to the activity, mission, and retroactive approval (to pre-award) under Recruitment and Retention of Volunteer Firefighters Activity
- Closeout issues and some excess funds requests under both the Hiring of Firefighters Activity and Recruitment and Retention of Volunteer Firefighters Activity
- Staffing Maintenance Level Waivers under the Hiring of Firefighters Activity
- Cost over/under run (adding funds to award/non-closeout deobligation* of funds) under both the Hiring of Firefighters Activity and Recruitment and Retention of Volunteer Firefighters Activity

FEMA will only consider amendments submitted via the online eGrants system. These requests must contain specific and compelling justifications for the requested change.

FEMA strongly encourages recipients to expend grant funds in a timely manner, to be consistent with SAFER Grant Program's goals and objectives.

NOTE: A recipient may deobligate (*i.e.*, return) unused funds (*i.e.*, those remaining funds previously drawn down via payment request and/or remaining award funding that was never requested) to DHS/FEMA prior to the end of an award's period of performance. To exercise this option, a recipient must submit a cost over/under run amendment via the eGrants system and state in the amendment that the unliquidated funds (*i.e.*, the funds to be returned) are not necessary for the fulfillment or success of the grant's obligations or mission. The recipient must also indicate in the amendment that it understands that the returned funds will be deobligated and unavailable for any future award expenses.

Deobligation of funds will decrease the federal portion of the grant and the amount of the recipient's Cost Share obligation. FEMA will confirm deobligation amendments with all points of contact; after confirmation of the recipient's intent to deobligate, FEMA will hold the approved deobligation request for 14 calendar days as a period for recipient reconsideration before FEMA processes the deobligation request.

VII. Disposition of Grant Funded Equipment

A recipient must use, manage, and dispose of SAFER-funded equipment in accordance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Property Standards for equipment at 2 C.F.R. § 200.313. With the exception of State government recipients, when original or replacement equipment acquired under an SAFER award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, the recipient must request disposition instructions from FEMA. A State government recipient must dispose of equipment acquired under a Federal award in accordance with State laws and procedures. FEMA strongly recommends contacting the SAFER Program Office prior to the disposition of SAFER-funded equipment.

VIII. Recipient Responsibilities Post Award

SAFER grant recipients must agree to the following:

Recipients must:

(a) perform all tasks (*i.e.*, the scope of work) as outlined in their FEMA-approved grant applications within the periods of performance,
(b) comply with the terms of this NOFO,
(c) comply with all the terms and conditions of their grant awards, including any special conditions in accordance with the articles of agreement, and
(d) comply with all applicable Federal statutory and regulatory requirements.

Recipients that do not fulfill their obligations under their SAFER grants will be considered in default and may be required to return the federal funds disbursed under the grant award.

Recipients under the Hiring of Firefighters Activity must agree to maintain operational staffing at the level that existed at the time of award and must also retain all SAFER-funded positions throughout the grant's full three-year period of performance unless FEMA affords the grant recipient a waiver of this requirement.

> At the time of award, recipients under the Hiring of Firefighters Activity must submit a current (pre-SAFER) roster listing paid operational/firefighting personnel, in support of NFPA 1710 or NFPA 1720, who are employees at time of award. The SAFER Program Office will work with recipients to establish the correct staffing maintenance numbers, which combine the number of pre-SAFER and SAFER-funded operational positions. Once this is established, recipients must agree to maintain this number throughout the period of performance by taking active and timely steps to fill any vacancies.
>
> Recipients under the Hiring of Firefighters Activity who lay off any operational personnel during the three-year period of performance will be considered in default of their grant and the award will be terminated. In those situations, recipients may be required to return the federal funds disbursed under the grant award.
>
> Recipients who are unable, due to documentable economic hardship, to backfill non-SAFER operational positions vacated through attrition (*e.g.*, resignation, retirement) after receiving an award may petition FEMA to waive the staffing maintenance requirements. Approved waivers allow recipients to decrease and reestablish the staffing maintenance numbers agreed to at the time of award by the number of positions that recipients are unable to fill. To qualify for this waiver, the economic hardship must affect the entire public safety sector in a recipient's jurisdiction, not just the fire department. FEMA will not grant waivers for SAFER-funded positions. Recipients who fail to maintain the required level of staffing risk losing federal funds awarded under this grant.

Since the SAFER program seeks to enhance incident scene safety, recipients must agree to make the primary assignments (more than 50 percent of time) of all SAFER-funded firefighters on an operational fire suppression vehicle, regardless of their collateral duties.

Recipients must agree to retain grant files and supporting documentation in a manner consistent with 2 C.F.R. § 200.333 – no less than for three years after submission of the closeout report (*see* below), and in some cases longer pursuant to 2 C.F.R. § 200.333.

> FEMA may require access to any pertinent books, documents, papers, or records belonging to a recipient. The DHS Office of Inspector General (OIG) or the

Comptroller General of the United States may also require access to a recipient's books and records.

The required documentation for federally funded purchases should include specifications, solicitations, competitive quotes or proposals, basis for selection decisions, purchase orders or contracts, invoices, and cancelled checks. Recipients who fail to document purchases may find their expenditures will be questioned and disallowed.

Recipients must agree to provide periodic performance reports to FEMA. In all years of the grant's period of performance, for both the Hiring of Firefighters and the Recruitment and Retention of Volunteer Firefighters Activities, recipients must submit quarterly performance reports as well as a final performance report at grant closeout. Payments are requested online using the automated system and payments are based on actual expenses incurred during the period covered by the payment request. Quarterly performance reporting is required regardless of whether or when a recipient requested funding.

Recipients must agree that, notwithstanding any provision of other laws, firefighters hired under these grants will not be discriminated against or be prohibited from engaging in volunteer firefighting activities in another jurisdiction during off-duty hours.

FEMA strongly encourages applicants, to the extent practicable, to seek, recruit, and hire military veterans to increase their ranks within their departments.