

Information on FY 2011 DHS Emergency Communications Grants – Leveraging the Homeland Security Grant Program to Advance Emergency Communications Priorities without the Interoperable Emergency Communications Grant Program

As you know, the Interoperable Emergency Communications Grant Program (IECGP) was defunded in FY 2011. IECGP was the only grant dedicated solely to emergency communications, and was instrumental in supporting the governance and planning of interoperable communications, including salaries for Statewide Interoperability Coordinators (SWIC), development of Statewide Communication Interoperability Plans (SCIP) and Standard Operating Procedures (SOP), and emergency communications-specific training, exercises, and equipment.

To ensure emergency communication priorities were preserved in FY 2011, the Office of Emergency Communications (OEC) worked with the Federal Emergency Management Agency (FEMA) to incorporate emergency communication goals and activities into the FY 2011 Homeland Security Grant Program (HSGP). Below is a summary of activities previously allowable under IECGP that are now allowable under HSGP. **Stakeholders are strongly encouraged to work with their State Administrative Agency (SAA) to leverage the FY 2011 HSGP Guidance to support and secure funding for emergency communication positions and activities.**

| Emergency Communication Priorities Funded through IECGP | Emergency Communication Priorities included in HSGP? | Page in HSGP Guidance |
|---|--|-----------------------|
| Funding for SWICs | YES | 41 |
| Alignment with SCIP | YES | 37, 62 |
| Update SCIP/SCIP Implementation Report | YES | 62, 64 |
| Coordination with SWIC | YES | 37 |
| Governance | YES | 13 |
| Standard Operating Procedures (SOP) | YES | 62 |
| Funding for NECP Goals | POSSIBLY | 38-39, 62, 64, 76-79 |
| Training and Exercises | YES | 76-79 |
| Equipment Standards | YES | 37-38 |
| Funding for Narrowband Activities | YES | 64 |
| Funding for Broadband Activities | YES | 37, 38 |

The attached reference guide provides a more detailed summary of each activity, how the activity has been incorporated into the FY 2011 HSGP Guidance, and any restrictions on funding which stakeholders should be aware.

ADDRESSING STAKEHOLDER CONCERNS

Stakeholders have raised the following concerns regarding the loss of IECGP funding for five primary activities:

- SWIC positions
- SCIP Implementation Reports
- NECP Goal implementation
- Narrowband compliance
- Emergency communication activities necessary for implementing the SCIP

OEC has provided additional guidance below to help stakeholders mitigate the loss of IECGP funds for these critical positions and activities.

Stakeholders are strongly encouraged to work with their State Administrative Agency (SAA) to maximize the use of HSGP funding to support emergency communication positions and activities.

1. Sustaining SWIC Positions

Under IECGP:

Funding for SWICs was prioritized. Grantees were required to demonstrate that a full-time SWIC was in place before allocating funds to other priorities, including:

- Standard operating procedures
- Training and exercises
- Equipment

Under HSGP:

Funding for SWIC Positions is allowable under HSGP, but is not prioritized. Grantees are not required to have a SWIC in place before allocating funds for other purposes.

In FY 2011 HSGP, SWICs are included as allowable personnel expenses (see page 41) under the:

- State Homeland Security Program (SHSP)
- Urban Area Strategic Initiative (UASI)
- Metropolitan Medical Response System (MMRS)
- Citizen Corps Program (CCP)

Funding Restriction:

- **SHSP and UASI Personnel Cap.** Grantees should be aware that there is a 50 percent (50%) personnel cap under the SHSP and UASI programs as directed by the Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act (Public Law 110-412). In general, the use of SHSP and UASI funding to pay for staff and/or contractor regular time or overtime/backfill is considered a personnel cost. Activities that are considered personnel and personnel-related, and therefore count against the personnel cost cap of 50 percent (50%), include the SWIC position (see page 35). Grantees who wish to seek a waiver from the personnel cost cap must provide documentation explaining why the cap should be waived; waiver requests will be considered only under extreme circumstances. (Note that FEMA has no standard form or format for waiver requests. Grantees seeking waivers should submit their written requests to their Program Managers, who will request additional information if needed.)

2. SCIP Implementation Reports

Under IECGP:

States and territories were required to submit SCIP Implementation Reports. FY 2011 SCIP Implementation Reports are due to OEC on September 30, 2011. Under IECGP, costs related to preparing or updating SCIP Implementation Reports were allowable.

Under HSGP:

Funding for SCIP Implementation Reports is included in HSGP. HSGP allows grantees to use planning funds for enhancing and implementing SCIP and Tactical Interoperable Communications Plans (TICP) that align with the goals, objectives, and initiatives of the National Emergency Communications Plan (NECP). (page 62)

Funding Restrictions:

There are no restrictions on funding.

3. NECP Goal Implementation

Under IECGP:

- States and territories are required to evaluate response-level communications performance in accordance with NECP Goal Two. NECP Goal Two requires that, by 2011, 75 percent (75%) of non-UASI jurisdictions are able to demonstrate response-level emergency communications within one hour for routine events involving multiple jurisdictions and agencies.

- States and territories were informed that they must demonstrate compliance with NECP Goal Two, report on NECP Goal Two outcomes, and include NECP Goal Two capabilities and performance reports in its FY 2011 SCIP Implementation Report, due on September 30, 2011.

Under HSGP:

NECP Goals activities are NOT specifically mentioned in the FY 2011 HSGP; however, the grant does fund planning, training, exercise and reporting activities that may help States and localities fulfill NECP Goal Two requirements. For example:

- States are allowed to use HSGP funding to:
 - Align investments with needs identified in plans, which may include NECP Goal One improvement plans
 - Support national initiatives, which may include NECP Goal compliance
 - Design, develop, conduct, and evaluate and exercise, including exercises to demonstrate Goal Two compliance
 - Develop Improvement Plans, which are also required for NECP Goal compliance
- Additionally, under HSGP, States are:
 - Required to develop multi-year exercise plans, which could include exercises related to NECP Goal compliance
 - Encouraged to conduct exercises that are large enough in scope and size to exercise multiple activities and warrant involvement from multiple jurisdictions and disciplines and non-governmental organizations, and take into account the needs and requirements for individuals with disabilities, similar to activities required to demonstrate compliance with NECP Goal Two
 - Allowed to use HSGP funding to plan for large, Special Events, which are also eligible activities in which States can use to demonstrate compliance with NECP Goal Two

Funding Restrictions:

NECP Goals are not directly mentioned in HSGP guidance; therefore, States are strongly encouraged to contact FEMA Program Managers to determine if NECP Goal-related activities are eligible for funding under HSGP. Activities that may be allowable include:

- Projects developed to close gaps in NECP Goal One improvement plans
- Exercises planned to demonstrate compliance with NECP Goal Two
- Planning activities related to NECP Goal Three compliance

4. Narrowband Compliance

In 2004, as part of a national initiative to improve spectrum efficiency, the Federal Communications Commission (FCC) mandated that by January 1, 2013 all public safety licensees operating in the 150-174 megahertz (MHz) and 421-512 megahertz (MHz bands) radio bands migrate from 25 kilohertz (kHz) bandwidth channel operations to 12.5 kilohertz (kHz) or narrower channels, or employ a technology that achieves the narrowband equivalent of one channel per 12.5 kHz of channel bandwidth for voice and transmission rates of at least 4800 bits per second per 6.25 kHz for data systems operating with bandwidths greater than 12.5 kHz.

Under IECGP:

In IECGP, narrowband planning activities were allowable under the grant, and all equipment purchased with IECGP funds were required to be narrowband compliant.

Under HSGP:

- DHS has allowed grantees to use funds to develop and enhance plans and protocols, including narrowband plans and activities associated with a conversion from wideband to narrowband voice channels (page 64).
- Grantees (and sub-grantees) are strongly encouraged to comply with the [FY 2011 SAFECOM Guidance for Emergency Communication Grants](#), which provides additional guidance on narrowbanding.

Funding Restrictions:

FCC licensing fees are not allowable under most grants

- Generally, Federal licensing fees that may be required as a result of narrowbanding, are not allowable under most Federal grants.
- Grantees should consult with FEMA Program Managers to determine if costs related to narrowbanding are allowable under HSGP.

5. Emergency communication activities necessary to implement the SCIP

Under IECGP:

In IECGP, emergency communication planning, SOPs, training, exercises, and equipment were allowable. The attached reference guide provides a more detailed summary of each activity funded under IECGP, how the activity has been incorporated into the FY 2011 HSGP Guidance, and any restrictions on funding which stakeholders should be aware. Stakeholders are strongly encouraged to work with their SAA to secure HSGP funding for emergency communication activities necessary to implement the SCIP.

Under HSGP:

Planning, SOPs, training, exercises and equipment are allowable under the program. Stakeholders should be fully aware that HSGP funds a wide array of emergency communication activities, including:

- Activities related to enhancing emergency communication plans (SCIP, TICP), that align to NECP goals and objectives (page 62)
- Activities related to NIMS compliance (page 49)
- Activities related to the implementation of the SCIP (page 62)
- Activities related to the NIPP Communications Sector Plan (page 62)
- Broadband activities (page 37)
- Communication projects that enhance metropolitan medical response under MMRS (page 42)
- Development of interoperable communications protocols and solutions (page 62)
- Development and enhancement of local, regional, statewide strategic and tactical emergency communication plans (page 64)
- Emergency communication alerts and warnings that serve disabled persons under CCP (page 21)
- Emergency communications equipment (page 37)
- Emergency communications towers (page 42)
- Interoperability assessments (page 65)
- Interoperability exercises, Special Event Planning, exercising on national scenarios (page 77, 82)
- Narrowband activities (page 64)

OEC strongly encourages stakeholders to review the FY 2011 HSGP Guidance and the attached matrix so they are fully aware of the activities funded under HSGP. Stakeholders should work with their SAAs to secure HSGP funding for critical emergency communication priorities, such as the SWIC, SCIP Implementation Reports, NECP Goal activities, and activities necessary to implement the SCIP.

Funding Restrictions:

Funding restrictions are included in the attached matrix.

RECOMMENDATIONS

OEC's Stakeholders are encouraged to leverage the FY 2011 HSGP Guidance and the attached reference guide, to educate and encourage SAAs to allocate HSGP funding for the SWIC position and critical emergency communication activities. Stakeholders should:

1. Work with the SAA to identify alternative (DHS and other than DHS) sources of funding for the SWIC position and other critical emergency communication activities. Stakeholders should review the list of grants funding emergency communications on the SAFECOM website at:
<http://www.safecomprogram.gov/SAFECOM/grant/default.htm>
2. Work with the SAA and eligible grantees to set aside a portion of HSGP funding, UASI funding, SHSP funding, and/or funding from its sub-programs (e.g., UASI, MMRS, CCP) to support the SWIC position and other critical emergency communication activities.
3. Work with the SAA to identify unexpended grant funds (e.g., unexpended funds from IECGP, HSGP) that may be used toward the SWIC position and other critical emergency communication activities. Most DHS grants have a three-year period of performance. Stakeholders can work with the SAA to identify unexpended grant funds (e.g., unexpended funds from IECGP, HSGP) that may be used toward the SWIC position and other emergency communication costs.
4. Notify the State executive and legislative branches on reductions in IECGP funding that will have an impact on emergency communications, including the SWIC position. Stakeholders are strongly encouraged to work with their State legislatures to formally establish the SWIC position and to secure annual funding from the State for the position. Additionally, stakeholders are encouraged to fill the SWIC position with an existing State-funded position, such as a police officer or PSIC project manager, who can serve as the SWIC for the State, or assign a committee of experts who can carry out the SWIC function.
5. Encourage the SWIC to attend Senior Advisory Council meetings (or similar) which may have access or information on other sources of funding (e.g., other than DHS).

CONCLUSION

OEC strongly encourages its stakeholders to work with the SAA to maximize the use of FY 2011 HSGP funds for the SWIC position and other essential emergency communication activities. OEC is committed to preserving the great progress we have made toward improving emergency communications in every State and across the Nation.

Stakeholders are welcome to reach out to OEC to request information and assistance on emergency communication priorities in HSGP. Please contact the OEC email at oecc@dhs.gov with any questions or comments.

Regards,

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