HOMELAND SECURITY

POLICY & PROCEDURES MANUAL



Programmatic

SOUTH CAROLINA LAW ENFORCEMENT DIVISION

OFFICE OF HOMELAND SECURITY

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# Purpose

The purpose of the Homeland Security Grant Programs within the South Carolina Law Enforcement Division (SLED) is to award, administer, and monitor federal grant programs for which the South Carolina Governor’s Office has designated SLED to be the administering agency. These grant programs include as primary the Homeland Security Grant Program and the Emergency Management Performance Grant Program. The Division also manages other grants as needed.

# Legislation, Regulation and Guidelines

## Authority

The United States Department of Homeland Security (DHS) is the federal agency charged with oversight and administration of these grant programs. Copies of all applicable federal legislation and regulations are maintained in Homeland Security Grants Administration files. The authority for managing the Homeland Security Grant program, the Emergency Management Performance Grant as well as other federal grants tied to Homeland Security for South Carolina stem from the Homeland Security Act of 2002, Public Law 107-296. In association with this, SLED was designated by the Federal Government as the State of South Carolina State Administrative Agency for Homeland Security Grants.

The Legislative Authority provided to SLED is found in the SC Code of Laws, SECTION 23-3-15: The South Carolina Law-Enforcement Division was given responsibility for…”(8) the coordination of counter terrorism efforts, including prevention against, preparation for, response to, and crisis management of acts of terrorism, in or affecting this State; coordination of federal grants associated with homeland security; creation of councils appropriate to its mission; and service as the Governor's representative to the United States Department of Homeland Security…” Additionally, the State of South Carolina Office of the Governor issued Executive Order 2003-02 on January 17, 2003 designating the South Carolina Law Enforcement Division (SLED) to “be the operational authority and lead state agency in the counter-terrorism effort including preparation against acts of terrorism in or affecting this State and in the crisis management response to such acts. SLED shall work closely with the Emergency Management Division (EMD) and the various governmental and private entities in South Carolina relevant to the homeland security mission. The South Carolina Emergency Operations Plan concerning terrorism is hereby placed into effect. The Chief of SLED shall create task forces or coordinating councils deemed appropriate to support this mission, and shall serve as the Governor’s representative to the United States Office of Homeland Security.” The Chief of SLED, also Homeland Security Advisor to the Governor (Chief Mark A. Keel), is the Authorized to Sign for all Homeland Security documents (proposals, awards, amendments, etc.). Under his authority and on his behalf, the SLED Office of Homeland Security Program Manager (Dr. Robert I. Connell) is the online Authorized Organizational Representative (AOR) who submits grant applications, reports, amendments, rescissions and accepts awards (via GRANTS.Gov, NDGRANTs…).

## Administrative, Cost & Audit Guidelines

Now that DHS has adopted 2 C.F.R. Part 200, these regulations will apply to all new Federal Emergency Management Agency (FEMA) grant awards that are made on or after December 26, 2014. The new regulations will supersede 44 C.F.R. Part 13, and the Office of Management and Budget (OMB) Circulars A-21, A-87, A-89, A-102, A-110, A-122, A-133, and sections of A-50 for all FEMA awards made on or after December 26, 2014. This means that recipients of HSGP funding must follow new administrative requirements and Cost Principles codified in 2 C.F.R. Part 200 instead of the previous regulations in 44 C.F.R. Part 13.

## Order of Precedence

In determining the relevant standards for the conduct of grant operations, grantees should consider the following, in precedential order:

1. • Public Laws
2. • Regulations
3. • Executive Orders
4. • Super Circular
5. • Departmental Policy
6. • Award Terms and Conditions

# Federal Application Procedures

## The Homeland Security Grant Program (HSGP) Application

The Homeland Security grant program (HSGP) application is submitted annually for Federal Funding: SAA submits an application in order to be considered for any federal assistance award. In accord with the Office of Grants and Training guidance the SAA must submit the following: SF-424 Application for Federal Assistance with Certifications (through Grants.gov); Non-Supplanting Certification; Assurances; Certifications Regarding Lobbying; Debarment, Suspension, and Other Responsibility Matters; and Drug-Free Workplace Requirement; DUNS Number; Program and Capability Enhancement Plan; Investment Justification; Grantees must also submit the following to receive funding: NIMS Certification Form, Other documents as required.

## The Emergency Management Performance Grant (EMPG) Application

The Emergency Management Performance grant (EMPG) application is submitted annually for federal funding: SAA submits an application in order to be considered for any federal assistance award. In accord with the Office of Grants and Training guidance, the SAA must submit the following: SF-424 Application for Federal Assistance with Certifications (through Grants.gov); Non-Supplanting Certification; Assurances; Certifications Regarding Lobbying; Debarment, Suspension, and Other Responsibility Matters; and Drug-Free Workplace Requirement; DUNS Number; Program and Capability Enhancement Plan; Investment Justification; Grantees must also submit the following to receive funding: NIMS Certification Form, Other documents as required.

NOTE: Other types of grants (Nonprofit Security Grant Program, Complex Coordinated Terrorist Attack…, etc.) are applied for in accord with the federal application guidance, and managed accordingly.

## Federal Awards & Revisions

Upon approval of the application, the grant will be awarded to the SAA or SLED. This date will be known as the “award date.” The award is accepted and electronically signed in the NDGrants system. The State’s obligation period must be met within 60 days of the award date. An obligation is defined as a definite commitment which creates a legal liability for the payment of funds for goods and services ordered or received. Four requirements must be met to obligate grant funds: 1) There must be some action to establish a firm commitment on the part of the awarding entity. 2) The condition must be unconditional on the part of the awarding entity. 3) There must be documentary evidence of the commitment. 4) The award terms must be communicated to the official grantee.

Additional requirements include:

The federal grant period for each program is often 36 months (specified in each respective grant award), beginning on the day of the grant award.

* + - Agencies should request extension requests sparingly, and they will be granted only due to compelling legal, policy, or operational challenges. State Administrative Agencies (SAA’s) may request waivers from the previously provided deadlines for discretionary grant funds where:
* adjusting the timeline for spending will constitute a verifiable legal breach of contract by the grantee with vendors or sub-recipients;
* where a specific statute or regulation mandates an environmental review that cannot be completed within this timeframe; or
* where other exceptional circumstances warrant a discrete waiver.
  + - Extensions to the initial period of performance identified in the award will be considered only through formal, written requests to the grantee’s respective Grant Program Directorate (GPD) or Regional Program Analyst and must contain specific and compelling justifications as to why an extension is required. South Carolina coordinates with the GPD or Regional Program Analyst as needed, when preparing an extension. All extension requests must address the following:
* Grant Program, Fiscal Year, and award number;
* Reason for delay – 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;
* Current status of the activity/activities;
* Approved period of performance termination date and new project completion date;
* Amount of funds drawn down to date;
* Remaining available funds, both Federal and non-Federal;
* Budget outlining how remaining Federal and non-Federal funds will be expended;
* Plan for completion including milestones and timeframes for achieving each milestone and the position/person responsible for implementing the plan for completion; and
* 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.
* Requests for scope changes to a grant must be submitted by the SAA or grant recipient via ND Grants as a Scope Change Amendment. The amendment request must include the following:
* Grant Program, Fiscal Year, and award number;
* A written request on the recipient’s letterhead, outlining the scope or objective change, including the approved projects from the IJ, the funds and relative scope or objective significance allocated to those projects, the proposed changes, and any resulting reallocations as a result of the change of scope or objective;
* An explanation why the change of scope or objective is necessary;
* How the proposed scope or objective changes to the project support the vulnerabilities and capability gaps identified in the approved IJ;
* The request must also address whether the proposed changes will impact the recipient’s ability to complete the project within the award’s period of performance.
* Requests for no cost budget amendments to a grant must be submitted by the SAA or grant recipient via ND Grants as a Budget Change Amendment. The amendment request will typically include:
  + Grant Program, Fiscal Year, and award number;
  + The grant program, fiscal year, and award number;
  + Current status of the activity/activities;
  + Amount of funds drawn down to date;
  + Remaining available funds, both Federal and non-federal;
  + Budget outlining how remaining Federal and non-federal funds will be expended;
  + Plan for completion, including milestones and timeframes for achieving each milestone and the position/person responsible for implementing the plan for completion.
  + NOTE: For grants that allow budget changes between projects of up to some limit (i.e.10%) without consulting DHS/FEMA, the SAA or grant recipient monitors all requests and changes in writing to determine whether budgetary change requests are allowable. If requested budgetary changes are not allowable per the grant guidance, the sponsoring agencies approval will be sought in writing using the steps recommended above. Once the re-budgetting process is approved, the projects are revised in the financial tracking system.
* Special conditions are attached to the annual federal awards from DHS for each grant program. The conditions may vary according to the grant program, and may also change from year to year. Some of these conditions are for informational purposes only. Others require specific actions or responses, such as submitting proof that the administering agency is compliant with federal EEOP regulations.

## Reports Due to DHS

The following reports are due to DHS for HSGP and EMPG:

### Federal Financial Report (FFR) (Required quarterly)

Obligations and expenditures must be reported to G&T on a quarterly basis through the FFR (425), which is due within 30 days of the end of each calendar quarter (e.g., for the quarter ending March 31, FFR is due on April 30). Please note that this is a change from previous fiscal years. A report must be submitted for every quarter the award is active, including partial calendar quarters, as well as for periods where no grant activity occurs. A copy of this form will be included in the initial award package.

The following reporting periods and due dates apply for the FFR:

|  |  |
| --- | --- |
| **Reporting Period** | **Report Due Date** |
| October 1 – December 31 | January 30 |
| January 1 – March 31 | April 30 |
| April 1 – June 30 | July 30 |
| July 1 – September 30 | October 30 |

Also, FFRs must be filed on-line through the internet. Recipients may review the Federal Financial Reporting Form (FFR) (SF-425) here: http://www.whitehouse.gov/sites/default/files/omb/grants/approved\_forms/SF-425.pdf, SF-425 OMB #00348-0061. Future awards and fund drawdowns will be withheld if these reports are delinquent.

### Performance Progress Reports (SF-PPR)

Recipients are responsible for providing updated performance reports using the SF-PPR on a biannual basis. Recipients must submit the cover page of the SF-PPR as an attachment to the ND Grants system. The SF-PPR can be accessed online. As part of the SF-PPR, recipients will be required to report on progress towards implementing the following performance measures:

* For fusion centers, the achievement of capabilities and compliance with measurement requirements within the Maturation and Enhancement of State and Major Urban Area Fusion Centers priority through the annual Fusion Center Assessment Program managed by the DHS Office of Intelligence and Analysis (I&A) and reported to DHS/FEMA.
* The following reporting periods and due dates apply for the PPR for multiple grants to include the HSPG and NSGP:

Reporting Period Report Due Date

Jan 1- June 30 July 30

Jul 1- Dec 31 Jan 30

* The following reporting periods and due dates apply for the PPR for multiple grants to include the EMPG and CCTA:

|  |  |
| --- | --- |
| **Reporting Period** | **Report Due Date** |
| October 1 – December 31 | January 30 |
| January 1 – March 31 | April 30 |
| April 1 – June 30 | July 30 |
| July 1 – September 30 | October 30 |

### Biannual Strategy Implementation Reports (BSIR)

* In addition to the quarterly financial and biannual performance progress reports, recipients are responsible for completing and submitting BSIRs through the Grants Reporting Tool (GRT). The BSIR is due within 30 days after the end of the reporting period (July 30 for the reporting period of January 1 through June 30 (the summer BSIR report); and January 30 for the reporting period of July 1 through December 31 (winter BSIR report). All required attributes of each project must be included. Updated obligations, expenditures, and significant developments must be provided within the BSIR to show progress of implementation for every project, as well as how expenditures support Planning, Organization, Equipment, Training and Exercises (POETE). The first BSIR will be due January 30 (30 days after the end of the first reporting period for the award). Subsequent BSIR reports will require recipients to report on a project-by-project basis.
* The Grants Reporting Tool (GRT) is the system in which HSGP recipients will submit their BSIR information. HSGP recipients are responsible for filing a semi-annual BSIR report in the GRT and should register to create an account as soon as possible. Recipients should go to the following link and follow the links to create a new account: https://www.reporting.odp.dhs.gov/. This report is used to track the progress toward the completion of projects.

### Emergency Operations Plan (EOP)

Recipients must update their EOP at least once every two years to comply with Comprehensive Preparedness Guide (CPG) 101 Version 2.0, Developing and Maintaining Emergency Operations Plans. Recipients will use the Unified Reporting Tool (URT) to report their compliance with this reporting requirement.

### Threat and Hazard Identification and Risk Assessment (THIRA) & State Preparedness Report (SPR)

* HSGP award recipients must complete, or update their THIRA & SPR using the URT by December 31 each year. For additional guidance on THIRA, please refer to CPG 201, Second Edition.
* The Unified Reporting Tool (URT) is DHS/FEMA’s collection mechanism for THIRA, SPR, and related preparedness information. The SPR includes questions related to NIMS adoption and implementation, CPG 101v2 compliance, and other preparedness questions, as appropriate. Information on the URT, including when recipients will receive the tool and how to use the tool, will be sent to recipients .
* Grantees will report NIMS implementation in the Operational Coordination section of the SPR.
* Senior Advisory Committee (SAC) Documentation Submission. Consolidated SAC Charter compliance reporting in to the SPR post-assessment section of the Unified Reporting Tool.

### Exercise Reporting

Exercise Evaluation and Improvement Exercises implemented with grant funds should be threat- and performance-based and should evaluate performance of critical tasks required to respond to the exercise scenario. Guidance on conducting exercise evaluations and implementing improvement is defined in the HSEEP Volume: Exercise Evaluation and Improvement located at http://hseep.dhs.gov. Exercises must be included in the Multiyear Exercise Plan calendar, and added to the National Exercise Schedule through the G&T Secure Portal. The SAA must report on scheduled exercises and ensure that an AAR and Improvement Plan (IP) are prepared for each exercise conducted with G&T support (grant funds or direct support) and submitted to G&T within 60 days following completion of the exercise. The AAR documents the performance of exercise related tasks and makes recommendations for improvements. The IP outlines the actions that the exercising jurisdiction plans to take to address recommendations contained in the AAR. Generally, the IP, with at least initial action steps, should be included in the final AAR. G&T is establishing a national database to facilitate the scheduling of exercises, the submission of the AAR/IPs and the tracking of IP implementation. Guidance on development of AARs and IPs is provided in the HSEEP manuals.

### Audit Reports

Financial and Compliance Audit Report

For audits of fiscal years beginning on or after December 26, 2014, recipients that expend $750,000 or more from all Federal funding sources during their fiscal year are required to submit an organization-wide financial and compliance audit report. The audit must be performed in accordance with the requirements of Government and Accountability Office’s (GAO) Government Auditing Standards. For audits of fiscal years beginning prior to December 26, 2014, recipients that expend $500,000 or more from all Federal funding sources during their fiscal year are required to submit an organization-wide financial and compliance audit report. The audit must be performed in accordance with GAO’s Government Auditing Standards.Subrecipient Application Process

## Subgrant Application Process-HS Grant Program

* + - The specific requirements for eligibility are unique to the Homeland Security Grant Program. South Carolina’s homeland security grant funds are awarded to state and local units of government and to special purpose districts. To ensure that eligibility criteria for this program are met, all subrecipient government agencies must sign the grant award and application identifying them as a unit of government or special purpose district. The Homeland Security Grant Administration Staff is responsible for determining recipient eligibility for this program.
    - Application Guidelines and Procedures are based on applicable Federal Homeland Security Grant Program guidance and procedures.
    - Subrecipient Application Due Dates for Homeland Security are determined by the Homeland Security staff each year depending upon the award date from DHS.
    - Receive Applications: Subrecipients complete and submit all required application forms and supporting documents.
    - Homeland Security applicants (Except for EMPG at this time) are required to submit applications through an online submission process. The applications are created and submitted through the Homeland Security Grants Electronic Grants Management System (EGMS). After a potential applicant submits their online application via the EGMS, and receives a grant award, one paper copy of the grant certification form, signed by the Official Authorized to Sign, the Finance Officer, and the Project Director, must be submitted to the Office of Homeland Security Grants Administration and posted to the appropriate grant file.

## Subgrant Application Process-EMPG.

The SC Emergency Management Division (EMD) is required to submit a work plan (per DHS guidance), a budget and budget narrative addressing EMPG related costs and expenses. This budget narrative should: (1) explain how the costs were estimated, (2) justify the need for the costs, and (3) outline how the match requirement of the grant program will be met. For clarification purposes, the narrative should include tables describing cost and expense elements (e.g. equipment list with unit costs/quantity). The SAA is required to obligate 100% of the total grant program amount to the SC EMD. The SAA reviews all documents for consistency with the State Strategy, THIRA & SPR; recommends changes if needed; then fills out the application and submits it the through the NDGrants Portal. One paper copy of the grant certification form, signed by the Official Authorized to Sign and the Project Director, must be submitted to the Office of Homeland Security Grants Administration and posted to the appropriate grant file when the grant award is made.

# HSAC Grant Approval and SAA Award Process

## HSAC Grant Approval

* + - After a preliminary review of the grant proposals, the SAA staff together with relevant technical efforts drafts investment justifications or reviews provided investment justifications, or program and budget plans and recommends their acceptance of disapproval, ultimately to the HSA/SAA. This process includes grant experts and discipline leader reviews referencing the grant guidance and such tools as the DHS Authorized Equipment List (AEL). In addition, planning, organization, equipment, training and exercise standards, gaps, capabilities (to include those from the federal Threat Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR)) are considered. These are taken together to optimally fund the reduction of risk in South Carolina—insuring that the projects to be funded have reasonable costs, are allocable, and allowable. Grant personnel and project managers are required to view all proposed costs in light of the grant guidance and the AEL; so, unallowable costs are identified and removed from grant applications before funds are applied.
    - The multi-disciplinary State Level Homeland Security Advisory Council (HSAC) was established to provide additional advisory support to the State Homeland Security Advisor and SAA regarding the statewide assessment, planning and policy development process for the Homeland Security Grant Program (State Homeland Security Program). The Homeland Security Director schedules a meeting of the HSAC to review the grant proposals.

The Homeland Security Director and SAA staff briefs the HSAC on the summaries and recommendations for the Homeland Security Grant Program. HSAC members will then vote to approve or disapprove the recommendations. This advisory council vote is considered by the HSA/SAA in the decision make process.

* + - So for all grants, the HSA/SAA determines what is to be done based on the above process.
  1. ***The Review Process and Final Grant Approval***
* Those to receive grant awards complete their detailed applications (work plan, budgets, etc.) and provide them to the SAA, and the programmatic staff reviews the grant applications’ milestones & budget pages to determine if any unallowable items were requested and to assess if all requested items are needed for the success of the program. Homeland Security staff and planners meet to staff the Homeland Security grants. Each application is discussed in detail, with any changes to the programmatic or budget pages being discussed at that time. All programmatic staff provide input regarding every application reviewed during the staffing.
* Accounting and programmatic staff review applications carefully for any miscalculations, addition errors (especially the bottom line total), ineligible items, etc. Additional reviews are conducted by executive staff.
* Based on the review, Special Terms and Conditions may be added to the grant. After the Special Terms and Conditions are signed off on by the subrecipient, the subrecipient Grant Award funds are available to reimburse allowed expenses.
* A special condition associated with the Environmental planning and Historic Preservation (EHP) review process for projects that will fund communication towers, physical security enhancements, new construction, renovation, and modifications to buildings or structures will be added to all approved grant applications to ensure that the subrecipient is fully aware of the federal requirements.
* The Grant Terms and Conditions may not be altered in any way by a subrecipient or applicant for any reason.
* Upon approval of the grant application (i.e. in the Electronic Grants Management System (EGMS)) and after the award, a Grant Adjustment Notice (GAN) will be generated, saved in the system, and emailed to the subrecipient. The GAN will notify the subrecipient that: the grant application has been approved; grant funds are released for obligation and expenditure; Reimbursement of grant expenditures are contingent upon clearance of assigned special conditions; the Environmental planning and Historic Preservation (EHP) review process must be approved by DHS/FEMA and the SAA before expenditure of grant funds for applicable grant projects; and compliance with grant terms and conditions and all procurement procedures is required to ensure full reimbursement of all expended grant funds.
* A subrecipient may request revisions to the approved grant application. Approval or denial by the SAA staff will depend on the DHS approved Investment Justification / Work Plan and the original intent of the project approved by the Homeland Security Advisor (HSA), Homeland Security Advisory Council (HSAC), and SAA. Any requested revisions or changes in project scope must be approved by the HSA/SAA, the HSAC as applicable, and DHS/FEMA as applicable.

## Award Documents

* + - Before awards are made, the SAA staff will check the federal/state suspension and debarment list to determine if any of the applicants are included and therefore should not be eligible to receive an award.
    - Award documents are routed through the Homeland Security Staff to the SLED Director for review and signature. The signed award packets consist of the cover letter and grant award to be signed by the SLED Chief (SAA).
    - Information concerning the Environmental planning and historic preservation (EHP) submittal and review for projects that will fund communication towers, physical security enhancements, new construction, renovation, and modifications to buildings or structures has been added to the grant award to ensure that recipients are fully cognizant of the federal requirements. Subrecipients must receive written approval from DHS/FEMA **prior** to the use of grant funds for project implementation. Failure of the subrecipient to submit EHP project information and receive approval by DHS/FEMA and the SAA **will** result in nonpayment of expended project funds and possible deobligation of the grant award.
    - Prepare award packets for mailing and file; hold to be mailed on award date.
    - Original plus one copy to the subrecipient.

# Subgrant Periods

* + Subgrant periods, for the grants are typically 12 months in duration. The terms grant year, calendar year, state fiscal year (SFY), and federal fiscal year (FFY) each refer to a different 12-month period. The grant year is determined by the different program requirements. The calendar year extends from January 1 to December 31, the state fiscal year extends from July 1 to June 30, and the federal fiscal year extends from October 1 to September 30.
  + A subrecipient may request an extension to the grant period in order to spend any remaining funds. Such requests are approved at the discretion of the Homeland Security staff, subject to the expiration of the federal grant period.

# Subgrant Monitoring

## General monitoring guidance

Grant recipients will be monitored periodically by SAA staff to ensure that the program goals, objectives, timeliness, budgets, and other related program criteria are being met (see the HS Grant Program Monitoring Kit). Monitoring is accomplished through a combination of office-based and on-site monitoring visits. Desktop monitoring is done at a minimum quarterly for budgets and program costs, and semi-annually for programmatic activities. These coincide with mandatory quarterly financial and semi-annual programmatic reports discussed below. Desktop and site programmatic monitoring are performed when any unusual grant activity is noticed, or when requested. Site monitoring occurs for most grants, once a year (exception during COVID-19 due tp quarantine and social distancing requirements). Monitoring involves the review and analysis of the financial, programmatic, and administrative issues relative to each program, and helps identify areas where technical assistance and other support may be needed. The SAA is responsible for monitoring subrecipient activities to provide reasonable assurance that the sub-recipient administers Federal awards in compliance with Federal and State requirements. Responsibilities include the accounting of receipts and expenditures, cash management, the maintaining of adequate financial records, and the refunding of expenditures disallowed by audits. This is facilitated by the use of the K2Share SPARS grant management system statewide. This makes it impossible for a subgrantee to claim more funds for a project than those initially budgeted by the SAA. Grant Terms and Conditions make it clear that a subgrantee that obligates more funds than allowed by the grant for a project is responsible to pay the associated bill. Cost overruns are subgrantees responsibility, unless there are reverted funds available to potentially support the subgrantee. In such a case, at the discretion of the SAA and in accord with grant guidance, such costs may be addressed. Those responsible for monitoring costs to accounts include the Homeland Security Senior Accountant, Homeland Security Program Manager, and the SAA/SLED Finance Office.

## Progress report.

Progress reports are due from the subrecipients on a semi-annual basis (30 days after the applicable period) for all but the EMPG and CCTA grants with reporting due every quarter—unless grant performance indicates a need for more frequent reporting. The final self-evaluation report that encompasses the entire grant period is due 45 days after the end of the grant period.

## Financial reports

Subrecipient financial reports are due to Homeland Security Grants Administration on a quarterly basis. These are due within 30 days after the end of each three-month period and consist of the current year’s Request for Payment forms and any accompanying receipts/invoices/documentation. Subrecipients may request reimbursement on a monthly basis, if needed. A report must be submitted each quarter even if the subrecipient does not wish to request reimbursement at that time. A final financial report is due 45 days after the end of the grant period.

# Unspent Funds

Every effort is made to minimize the amount of money that is returned to DHS. The following are ways to minimize the amount of reverted funds:

* + Encourage subrecipients to submit budget revision requests as soon as the need becomes apparent. This allows them more time to plan for the expenditure of any remaining funds.
  + A very effective preventative measure to minimize reverted funds is for Homeland Security staff to actively recommend appropriate ways to expend remaining funds before the end of the grant period. Staff should check to see which subgrants have excessive amounts unspent several months prior to the end of the grant period and contact the Project Directors to discuss the likelihood of this money being spent. It may be that some or all of the funds have been spent but reimbursement has not yet been requested. If the funds haven’t been spent and there are no concrete plans to do so, staff should work with the Project Director to develop ideas for appropriate expenditure. Other ideas for expenditure of remaining project grant funds may be gleaned from other subgrants that are similar in nature and program area.
  + If funds still remain unspent near the end of the grant period, the subrecipient may request an extension of the grant period. Grant period extensions are only approved under extenuating circumstances. This request is made using the same form as for budget revision requests. Any unspent Homeland Security funds are returned to be awarded as reverted funds. However, any subgrant(s) funded using this money must be given a grant number by Homeland Security Grants Administration that reflects the federal fiscal year from which the funds originated.
  + Some of the grants funded with reverted funds are selected from Homeland Security applications that would have been funded under the normal grant cycle, had funds been available at that time. These projects were determined to be worthy of funding by Homeland Security staff, but may have been seen as a lesser priority at the time of original review. Consideration is also given to subrecipients who notify the Homeland Security Program Coordinator of a project they deem to be worthy of consideration for funding that was not submitted during the normal grant cycle. The applications are ranked as to priority for funding. The SAA staff drafts summaries and recommendations based on these funding priorities for review by the state HSAC.
  + The Homeland Security Program Manager schedules all meetings of the HSAC.
  + The Homeland Security Program Manager and SAA staff briefs the HSAC on the summaries and recommendations for the Homeland Security Grant Program. State HSAC members will then vote to approve or disapprove the recommendations. This advisory vote is utilized to determine which applications are funded.
  + The grant period of these projects depend on the length of time left in the federal grant period.

# Grant File Maintenance

* + Grant records are maintained in hard copy, on network computer files, and the SC Electronic Grant Management System (EGMS). NOTE: The SCEMD EMPG grant is not yet included in the EGMS. The hardcopy files contain all documentation related to the grant, including the signed, original of the grant application and the Grant Award document.
  + The Homeland Security computer files are stored on the SLED network drive in the Homeland Security folder. Within this folder are many subfolders including Grant Applications, Grant Documents, Procurement-Reimbursement, Special Conditions, and folders for each fiscal year, which are further divided into a subfolder for each grant number, which contains all correspondence, as well as monitoring reports.
  + Paper files are kept on site (& for the EMPG, at SCEMD) for three years after the close of the grant, then boxed and sent to Archives for an additional five years. After a total of eight years, they are destroyed. Archives require the boxes to be labeled with specific information, and specific forms to accompany the boxes are also necessary.

# Homeland Security Management and Administration

* + The costs of administering the Homeland Security Grant Program is borne by using portions of the federal allocations. Federal legislation and regulations limit the percentage of each allocation that may be used for Management and Administration (M&A). When one FFY of M&A (e.g., FFY2020) is expended, the next FFY of M&A (e.g. FFY2021) should have already been written and approved so that it can immediately be drawn down for use.
  + The Homeland Security Senior Accountant along with the Program Manager sets aside the necessary M&A funds from the allocations and writes internal budgets. A separate account code is established for each of these, which must be used whenever incurring an expense.
  + The Homeland Security M&A is limited according to HS guidelines for the federal fiscal year allocation.
  + Some grant programs (EMGP, Nonprofit Security Grant Program (NSGP)) allow no funds for required M&A activities at the SAA. All M&A funding is passed directly to SCEMD or to the subrecipients for NSGP.

# Homeland Security Grant Administration Staff Training

* + Homeland Security Program Office staff professional development is very important to increasing job knowledge and developing and maintaining communication with equivalent staff in other states. Opportunities may include training offered by the Department of Homeland Security, and federal entities such as NCJA.
  + All in-state trainings and overnight stays must be approved prior to the event. A Sled Training Registration Request Form and a Travel Accountability Request Form must be completed and signed. All out-of-state Homeland Security trainings must be pre-approved by the Homeland Security Program Office Manager and the Homeland Security Training Point of Contact (TPOC).

# APPENDIX A. Homeland Security Advisory Council

## Accomplishing the Mission

The State of South Carolina has established the Homeland Security Advisory Council to support and advise the State Law Enforcement Division concerning its counter terrorism mission in an effort to facilitate and foster cooperation and coordination among various governmental and private entities and disciplines both statewide and regionally. This shall be accomplished through:

* + - planning,
    - training/exercises,
    - determining required resources including equipment and location,
    - grant funding recommendations,
    - information sharing,
    - mutual aid agreements,
    - establishing best practices, and,
    - any other activities consistent with furthering the counter terrorism effort.

## Homeland Security Advisory Council Organization

**See chart on next page**

# Homeland Security Advisory Council Structure

***Governor***

Henry D. McMaster

***State Law Enforcement Division***

Chief Mark A. Keel

***Homeland Security Advisory Council***

**SLED Chief, Homeland Security Advisor to the Governor – Chairman**

SC Emergency Management Division Director Sheriffs’ Association President

Department of Health and Environmental Control Police Chiefs’ Association President

U.S. Coast Guard Captain of the Port Fire Chiefs’ Association President

Federal Bureau of Investigation SAC Fire Fighters’ Association President

State Adjutant General Emergency Management Association President

Department of Agriculture Commissioner Emergency Medical Services Association Pres

State Fire Marshal SC Hospital Association President

Department of Technology, Chief Information Officer Department of Education Superintendent

Department of Natural Resources Director Commission on Higher Education Exec. Dir.

Department of Transportation Secretary Department of Social Services Director

Department of Public Safety Director Department on Aging

SC Criminal Justice Academy Director Regional Representatives

Department of Juvenile Justice Director Statewide Interoperability Executive Committee

State Citizens Corps Whole Community Council SC VOAD Representative

Tribal Organization Leader Office of Technology and Information Services Statewide Interoperability Coordinator Chief Information Security Officer

Office of Technology and Information Services

**Pee Dee**

**Regional Advisory**

**Council**

SLED

SCEMD

DHEC

Sheriffs (2)\*

Police Chiefs (2) \*

Fire Service (2)\*

Emerg. Medical Svcs.(2)\*

Local Emerg. Mgmt. (2)\*

DNR

DPS

Regional Response Team Leaders

SIEC Members (3)

\*1-small and 1-large county

Regional Response Team Leaders

SIEC Members (3)

\*1-small and 1-large county

**Midlands**

**Regional Advisory Council**

SLED

SCEMD

DHEC

Sheriffs (2)\*

Police Chiefs (2) \*

Fire Service (2)\*

Emerg. Medical Svcs.(2)\*

Local Emerg. Mgmt. (2)\*

DNR

DPS

Regional Response Team Leaders

SIEC Members (3)

\*1-small and 1-large county

.(2)\*

Local Emerg. Mgmt. (2)\*

DNR

DPS

Regional Response Team Leaders

SIEC Members (3)

\*1-small and 1-large county

**Low Country**

**Regional Advisory Council**

SLED

SCEMD

DHEC

Sheriffs (2)\*

Police Chiefs (2) \*

Fire Service (2)\*

Emerg. Medical Svcs.(2)\*

Local Emerg. Mgmt. (2)\*

DNR

DPS

Regional Response Team Leaders

SIEC Members (3)

\*1-small and 1-large county

**Piedmont**

**Regional Advisory Council**

SLED

SCEMD

DHEC

Sheriffs (2)\*

Police Chiefs (2) \*

Fire Service (2)\*

Emerg. Medical Svcs.(2)\*

Local Emerg. Mgmt. (2)\*

DNR

DPS

Regional Response Team Leaders

SIEC Members (3)

\*1-small and 1-large county

\*

Local Emerg. Mgmt. (2)\*

DNR

DPS

Regional Response Team Leaders

SIEC Members (3)

\*1-small and 1-large county

# APPENDIX B. Forms Used in Homeland Security

1 Quarterly Fiscal Report (No Expenditures)

2 Procurement Procedures with GSA Statement

3 Monitoring Short Form

4 Environmental Planning and Historic Preservation (EHP) Memo

5 Grant Certification Pages

6 Homeland Security Contract Checklist

7 Homeland Security Grant Program Training Form

8 Homeland Security Program Office Contract Template

9 Notification of Single Annual Audit Form

10 Personnel Certification Form - Multiple Grants

11 Personnel Certification Form - One Grant

12 Personnel Worksheets

13 Progress Report Form

14 Property Control Form

15 Sole Source Procurement Form

16 Training Approval Form

17 Final Evaluation Report Template

18 Travel Support documents

19 FEMA Controlled Equipment Forms