

**The U.S. Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)
Fiscal Year (FY) 2018 Transit Security Grant Program (TSGP)**

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, [Application and Submission Information](#).

A. Program Description

Issued By

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

Catalog of Federal Domestic Assistance (CFDA) Number

97.075

CFDA Title

Rail and Transit Security Grant Program

Notice of Funding Opportunity Title

Transit Security Grant Program

NOFO Number

DHS-18-GPD-075-00-02

Authorizing Authority for Program

Section 1406 of the *Implementing Recommendations of the 9/11 Commission Act of 2007* (Pub. L. No. 110-53) (6 U.S.C. § 1135)

Appropriation Authority for Program

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

Program Type

New

Program Overview, Objectives and Priorities

Overview

The FY 2018 Transit Security Grant Program (TSGP) is set against the backdrop of a year in which the United States faced numerous and unprecedented homeland security challenges. These included the three major hurricanes that devastated parts of Texas, Florida, and much of Puerto Rico and the U.S. Virgin Islands, as well as massive wildfires across the State of California. In addition to these natural disasters, the Nation also responded to multiple incidents as part of the evolving threat landscape, including witnessing the first known attempted terrorist attack against mass transportation on our soil; cyberattacks against critical port infrastructure; and mass casualty events involving both vehicles and active shooters.

The National Preparedness Goal (the Goal) defines what it means to be prepared for such 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 requires the combined effort of the whole community. To that end, the FY 2018 TSGP 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 TSGP 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 Transit Security Grant Program supports the goal of Ready 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.

Objectives

Within this broader construct, the objective of the FY2018 TSGP is to provide funds to eligible public transportation systems (which include intra-city bus, ferries and all forms of passenger rail) for the protection of critical transportation infrastructure and the travelling public from acts of terrorism and to increase the resilience of transit infrastructure.

Performance metrics for this program are as follows:

- Percentage of funding building new capabilities
- Percentage of funding sustaining existing capabilities

Priorities

Recipients of the FY 2018 TSGP are encouraged to accomplish these objectives through activities such as:

- Planning
- Use of visible, unpredictable deterrence, to include operational packages (K-9 Teams, mobile screening teams, or anti-terrorism teams)
- [Top Transit Asset List \(TTAL\)](#) risk remediation
- Protection of other high-risk/high-consequence areas or systems that have been identified through system-wide risk assessments
- Security training for employees
- Public awareness/preparedness campaigns
- Emergency preparedness drills and exercises

B. Federal Award Information

Award Amounts, Important Dates, and Extensions

Available Funding for the TSGP: **\$88,000,000**

Period of Performance: **Thirty-six (36) months**

Extensions to the period of performance are allowed. For additional information on period of performance extensions, refer to [Section H – Additional Information](#) of this NOFO.

Projected Period of Performance Start Date: **September 1, 2018**

Projected Period of Performance End Date: **August 31, 2021**

Funding Instrument: **Grant**

C. Eligibility Information

Eligible Applicants

Public Transportation Agencies as listed in [Appendix A – Eligible Rail, Intra-City Bus, and Ferry Transit Agencies](#).

Eligibility Criteria

Agencies eligible for the FY 2018 TSGP are determined based upon daily unlinked passenger trips (ridership) and transit systems that serve historically eligible Urban Area Security Initiative (UASI) jurisdictions as indicated in Appendix A. Certain ferry systems are eligible to participate in the FY 2018 TSGP and receive funds. However, any ferry system electing to participate and receive funds under the FY 2018 TSGP will not be eligible to participate under the FY 2018 Port Security Grant Program (PSGP) and will not be considered for funding under the FY 2018 PSGP. Likewise, any ferry system that participates in the PSGP will not be eligible for funding under the TSGP.

Sections 1405 (6 U.S.C. § 1134) and 1406 (6 U.S.C. § 1135) of the *Implementing Recommendations of the 9/11 Commission Act of 2007* require that high risk public transportation agencies that receive grant funding develop a security plan based on a security assessment. Additionally, the statutes direct that grant funds be used to address items in the security assessment or the security plan. In order to be eligible for the FY 2018 TSGP, transit agencies must have developed, or updated, their security plan. The security plan must be based on a security assessment such as the Baseline Assessment for Security Enhancement (BASE), which is performed by the Transportation Security Inspectors-Surface division of the Transportation Security Administration (TSA). This security assessment must have been conducted within the last three years prior to receiving an FY 2018 TSGP award.

A copy of the security plan and security assessment must be available for DHS/FEMA review upon request. Please see [Appendix G – Security Plan Requirements](#) for more information on security plan requirements.

Entities providing transit security (e.g., city/county police department and public transportation agency's own police department) for a public transportation agency must approve the security plan. The signature of a responsible official from the agency's transit security provider serves as this approval. If there is more than one provider in the core service area, all transit security providers must review and concur with the plan.

Associated documentation of this approval must be provided to DHS/FEMA upon request. In addition, the agency's transit security provider is encouraged to review the Investment Justifications (IJs) prior to submission.

Each public transportation agency receiving funds through this program must participate in a Regional Transit Security Working Group (RTSWG) or develop a RTSWG if one does not already exist. The RTSWG should serve as the forum for regional partners to discuss risk, planning efforts, and mitigation strategies. These discussions should be held regardless of funding to continue enhancing the overall security of the region. Regional working groups are a best practice for enhancing security and are encouraged for all jurisdictions.

[Appendix A – Eligible Rail, Intra-City Bus, and Ferry Public Transportation Agencies](#) provides a list of eligible transit agencies. Eligibility does not guarantee grant funding.

Other Eligibility Criteria

National Incident Management System (NIMS) Implementation

Prior to allocation of any Federal preparedness awards in FY 2018, recipients must ensure and maintain adoption and implementation of NIMS. FEMA describes the specific activities involved in NIMS implementation in the NIMS Implementation Objectives (<https://www.fema.gov/implementation-guidance-and-reporting>).

Incident management activities require carefully managed resources (personnel, teams, facilities, equipment and/or supplies). Utilization of the standardized resource management concepts such as typing, credentialing and inventorying promote a strong national mutual aid

capability needed to support delivery of core capabilities. Recipients should manage resources purchased or supported with FEMA grant funding according to NIMS resource management guidance.

Additional information on resource management and NIMS resource typing definitions and job titles/position qualifications is on DHS/FEMA's website under <http://www.fema.gov/resource-management-mutual-aid>.

Cost Share or Match

There is no cost share requirement for the FY 2018 TSGP.

D. Application and Submission Information

Key Dates and Times

Date Posted to Grants.gov: **May 21, 2018**

Application Submission Deadline: **June 20, 2018, 5:00 p.m. ET**

DHS/FEMA will not review applications that are not received by the deadline or consider them for funding. DHS/FEMA may, however, extend the application deadline on request for any applicant who can demonstrate that 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.

Applicants experiencing technical issues must notify the FEMA Headquarters (HQ) Program Analyst prior to the application deadline. If applicants do not know their FEMA HQ Program Analyst or if there are programmatic questions or concerns, please contact the Centralized Scheduling and Information Desk (CSID) by phone at (800) 368-6498 or by e-mail at askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

Anticipated Funding Selection Date: **August 27, 2018**

Anticipated Award Date: **No later than September 30, 2018**

Address to Request Application Package

Application forms and instructions are available on Grants.gov (hardcopies of the NOFO and associated application materials are not available). To access the application package, select "Applicants" then "Apply for Grants" followed by "Get Application Package." Enter the Funding Opportunity Number located on the first page of this NOFO. Select "Apply" and then "Create Workspace." Follow the prompts to download the instructions and begin the application.

In addition, the following Telephone Device for the Deaf (TDD) and/or Federal Information Relay Service (FIRS) number available for this Notice is: (800) 462-7585

Content and Form of Application Submission

Applying for an award under this program is a multi-step process. To ensure that an application is submitted on time, applicants are advised to start the required steps well in advance of their submission. Failure of an applicant to comply with any of the required steps before the deadline for submitting their application may disqualify their application from funding.

The steps involved in applying for an award under this program are:

1. Applying for, updating, or verifying their Data Universal Numbering System (DUNS) Number and Employer ID Number (EIN);
2. Updating or verifying their System for Award Management (SAM) Registration;
3. Establishing an Authorized Organizational Representative (AOR) in [Grants.gov](https://www.grants.gov);
4. Submitting an initial application in [Grants.gov](https://www.grants.gov); and
5. Submitting the final application in the [ND Grants](https://www.ndgrants.gov) system.

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/FEMA may not make a federal award to an applicant until the applicant has complied with all applicable DUNS and SAM requirements and, if an applicant has not fully complied with the requirements by the time DHS/FEMA is ready to make a federal award. DHS/FEMA may determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

Electronic Delivery

DHS/FEMA is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS/FEMA requires applicants to submit their applications online through [Grants.gov](https://www.grants.gov) and [ND Grants](https://www.ndgrants.gov).

How to Register to Apply through [Grants.gov](https://www.grants.gov)

1. *Instructions:* Read the instructions below about registering to apply for DHS/FEMA funds. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process. Reviewing and assembling the required information before beginning the registration process will alleviate last-minute searches for required information.

The registration process can take up to four weeks to complete. Therefore, registration should be done in sufficient time to ensure it does not impact your ability to meet required application submission deadlines.

Organizations must have a DUNS Number, active SAM registration, and Grants.gov account to apply for grants.

If individual applicants are eligible to apply for this grant funding opportunity, refer to: <https://www.grants.gov/web/grants/applicants/registration.html>

Organization applicants can find complete instructions here: <https://www.grants.gov/web/grants/applicants/organization-registration.html>

2. *Obtain a DUNS Number:* All entities applying for funding, including renewal funding, must have a DUNS number from Dun & Bradstreet (D&B). Applicants must enter the DUNS number in the data entry field labeled "Organizational DUNS" on the SF-424 form.

For more detailed instructions for obtaining a DUNS number, refer to: <https://www.grants.gov/web/grants/applicants/organization-registration/step-1-obtain-duns-number.html>

3. *Register with SAM:* In addition to having a DUNS number, all organizations applying online through Grants.gov must register with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

For more detailed instructions for registering with SAM, refer to: <https://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html>

4. *Create a Grants.gov Account:* The next step in the registration process is to create an account with Grants.gov. Applicants must know their organization's DUNS number to complete this process.

For more information, follow the on-screen instructions or refer to: <https://www.grants.gov/web/grants/applicants/registration.html>

5. *Add a Profile to a Grants.gov Account:* A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one Grants.gov account to access all of your grant applications. To add an organizational profile to your Grants.gov account, enter the DUNS Number for the organization in the DUNS field while adding a profile.

For more detailed instructions about creating a profile on Grants.gov, refer to: <https://www.grants.gov/web/grants/applicants/registration/add-profile.html>

6. *EBiz POC Authorized Profile Roles:* After you register with Grants.gov and create an Organization Applicant Profile, the organization applicant's request for Grants.gov roles and access is sent to the EBiz POC. The EBiz POC will then log in to Grants.gov and authorize

the appropriate roles, which may include the AOR role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.

For more detailed instructions about creating a profile on Grants.gov, refer to: <https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html>

7. *Track Role Status:* To track your role request, refer to: <https://www.grants.gov/web/grants/applicants/registration/track-role-status.html>
8. *Electronic Signature:* When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The EBiz POC **must** authorize individuals who are able to make legally binding commitments on behalf of the organization as an AOR; **this step is often missed and it is crucial for valid and timely submissions.**

How to Submit an Initial Application to DHS/FEMA via Grants.gov

Grants.gov applicants apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different webforms within an application. For each Notice of Funding Opportunity (NOFO), you can create individual instances of a Workspace. **Applicants are encouraged to submit their initial application in [Grants.gov](https://www.grants.gov) at least seven days before the June 20, 2018, application deadline.**

Below is an overview of applying on Grants.gov. For access to complete instructions on how to apply for opportunities using Workspace, refer to:

<https://www.grants.gov/web/grants/applicants/workspace-overview.html>

1. *Create a Workspace:* Creating a Workspace allows you to complete it online and route it through your organization for review before submitting.
2. *Complete a Workspace:* Add participants to the Workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission.
3. *Adobe Reader:* If you decide not to apply by filling out webforms, you can download individual PDF forms in Workspace so that they will appear similar to other Standard or DHS/FEMA forms. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader.

NOTE: Visit the Adobe Software Compatibility page on [Grants.gov](https://www.grants.gov) to download the appropriate version of the software at: <https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html>

4. *Mandatory Fields in Forms:* In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.
5. *Complete SF-424 Fields First:* The forms are designed to fill in common required fields across other forms, such as the applicant name, address, and DUNS number. To trigger this feature, an applicant must complete the SF-424 information first. Once it is completed, the information will transfer to the other forms.
6. *Submit a Workspace:* An application may be submitted through workspace by clicking the “Sign and Submit” button on the Manage Workspace page, under the Forms tab. Grants.gov recommends submitting your application package at least ten days prior to the close date to provide you with time to correct any potential technical issues that may disrupt the application submission.
7. *Track a Workspace:* After successfully submitting a workspace package, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the Confirmation page that is generated after submission. Using the tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

For additional training resources, including video tutorials, refer to:

<https://www.grants.gov/web/grants/applicants/applicant-training.html>

Applicant Support: Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to the specific grant opportunity, contact the number listed in the application package of the grant you are applying for.

If you are experiencing difficulties with your submission, it is best to call the [Grants.gov](#) Support Center and get a ticket number. The Support Center ticket number will assist the DHS/FEMA with tracking your issue and understanding background information on the issue.

Submitting the Final Application in Non Disaster Grants System (ND Grants)

After submitting the initial application in [Grants.gov](#), eligible applicants will be notified by DHS/FEMA and asked to proceed with submitting their complete application package in [ND Grants](#). Applicants can register early with ND Grants and are encouraged to begin their ND Grants registration at the time of this announcement or at the latest, ten days before the application deadline. Early registration will allow applicants to have adequate time to start and complete their application.

In [ND Grants](#), applicants will be prompted to submit all of the information contained in the following forms. Applicants should review these forms before applying to ensure they have all the information required:

- Standard Form 424A, Budget Information (Non-construction)
- Standard Form 424B, Standard Assurances (Non-construction)

- Standard Form LLL, Disclosure of Lobbying Activities

In addition, applicants must submit copies of the following in [ND Grants](#):

- Standard Form 424C, Budget Information (Construction) if applying for grants to support construction;
- Standard Form 424D, Standard Assurances (Construction) if applying for funds to use for construction;
- Investment Justification(s);
- Detailed Budget(s); and
- Indirect Cost Agreement, if applicable.
- Five-Year Security Capital and Operational Sustainment Plan (OPack requests only).

For assistance registering for the ND Grants system, please contact ndgrants@fema.gov or (800) 865-4076.

Timely Receipt Requirements and Proof of Timely Submission

All final applications must be received in [ND Grants](#) by **5:00 PM Eastern Time** on June 20, 2018. Proof of timely submission is automatically recorded by [ND Grants](#). The initial application in Grants.gov must be completed by June 13, 2018. An electronic date/time stamp is generated within the system when the application is successfully received by [ND Grants](#). The applicant with the AOR role who submitted the application will receive an acknowledgement of receipt and a tracking number (GRANTXXXXXXXX) from [Grants.gov](#) with the successful transmission of their initial application. This applicant with the AOR role will also receive the official date/time stamp and [Grants.gov](#) Tracking number in an email serving as proof of their timely submission.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before [Grants.gov](#) and [ND Grants](#) receive your application. Again, [Grants.gov](#) will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role. The [Grants.gov](#) Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the systems time to process the application.

Applicants needing assistance with the [ND Grants](#) system should contact ndgrants@fema.gov or (800) 865-4076.

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 <http://www.fws.gov/policy/library/rgeo12372.pdf>).

Funding Restrictions

Federal funds made available through this award may be used only for the purpose set forth in this award and must be consistent with the statutory authority for the award. Award funds may not be used for matching funds for any other Federal awards, lobbying, or intervention in Federal

regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal Government or any other government entity.

Applicants should review [Appendix C, Funding Guidelines](#), for detailed information on funding restrictions.

Environmental Planning and Historic Preservation (EHP) Compliance

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 grant funded projects, comply with Federal EHP regulations, laws and Executive Orders as applicable. Recipients and subrecipients proposing projects that have the potential to impact the environment, including but not limited to construction of communication towers, modification or renovation of existing buildings, structures and facilities, or new construction including replacement of facilities, must participate in the DHS/FEMA EHP review process. The EHP review process involves the submission of a detailed project description along with supporting documentation so that DHS/FEMA may determine whether the proposed project has the potential to impact environmental resources and/or historic properties. In some cases, DHS/FEMA is also required to consult with other regulatory agencies and the public in order to complete the review process. The EHP review process must be completed before funds are released to carry out the proposed project; otherwise, DHS/FEMA may not be able to fund the project due to non-compliance with EHP laws, Executive Orders, regulations, and policies.

Additionally, all recipients are required to comply with DHS/FEMA EHP Policy Guidance, FEMA Policy #108-023-1. The EHP screening form is located [here](#) and further EHP guidance can be found at <https://www.fema.gov/media-library/assets/documents/85376>.

Emergency Communications and Resilience

All entities using TSGP funding to support emergency communications investments are required to comply with the [SAFECOM Guidance on Emergency Communications Grants \(SAFECOM Guidance\)](#). The SAFECOM Guidance provides current information on emergency communications policies, eligible costs, best practices, and technical standards for State, local, tribal, and territorial grantees investing Federal funds in emergency communications projects. It is also designed to promote and align with the [National Emergency Communications Plan \(NECP\)](#). Conformance with the SAFECOM Guidance helps ensure that Federally-funded investments are compatible, interoperable, resilient, and support national goals and objectives for improving emergency communications.

FirstNet

The *Middle Class Tax Relief and Job Creation Act of 2012*, Pub. L. No. 112-96, as amended (codified in part at 47 U.S.C. §§ 1401-1473) established the First Responder Network Authority (hereinafter FirstNet Authority) as an independent authority within the National Telecommunications and Information Administration (“NTIA”).¹ The FirstNet Authority’s statutory mission is to establish a nationwide public safety broadband network

¹ 47 U.S.C. § 1424(a).

(FirstNet).² FirstNet uses the 700 MHz D block spectrum to provide Long-Term Evolution (LTE)-based broadband services and applications to public safety entities.³ FirstNet became operational in March 2018 and is based on a single, national network architecture that will evolve with technological advances and initially consist of a core network and radio access network (RAN).

FirstNet will provide public safety entities with mission critical broadband data capabilities and services including, but not limited to messaging, image sharing, video streaming, group text, voice, data storage, application, location-based services, and Quality of Service, and Priority and Preemption. Public safety entities seeking to enhance their operational capabilities using broadband technology may seek grant funding to support the following:

- **Planning for integration** of Information Technology (IT) infrastructure, software, and site upgrades necessary to connect to FirstNet.
- **Handheld broadband devices** including smartphones, feature phones, tablets, wearables, push-to-talk (PTT) devices.
- **Vehicle-mounted or otherwise field operated data devices** such as ruggedized laptops.
- **Network access devices** including portable Wi-Fi devices, Universal Serial Bus (USB) modems/dongles, trunk-mounted modems, routers.
- **Customer Owned and Managed (COAM) broadband deployable equipment**, enabling public safety to own and dispatch coverage expansion or capacity enhancement equipment within their jurisdiction.
- **Broadband device accessories** that enable efficient and safe public safety operations such as headsets, belt clips, ear pieces, remote Bluetooth sensors, ruggedized cases. **Subscriber Identification Modules (SIMs)/Universal Integrated Circuit Cards (UICCs)** to allow public safety users to update existing devices to operate on public safety prioritized services.
- **One-time purchase and Subscription-based applications** for public safety use which could include, among a number of other options, enterprise mobility management (EMM), mobile device management (MDM), mobile Virtual Private Network (VPN), identify services, or cloud service tools.

As FirstNet is built out in all 56 states and territories and coverage and capacity for first responders expands, recipients are strongly encouraged to coordinate with the Statewide Interoperability Coordinator (SWIC) and FirstNet on (1) the planning, deployment timelines, and operational availability of the network deployment within a specific state or territory; (2) to ensure the project does not conflict with network planning efforts; and (3) that the project complies with all technical requirements. FirstNet requires participating agencies to demonstrate a subscription to public safety-prioritized broadband services to purchase FirstNet broadband devices or applications. **Information Bulletin #386 is hereby rescinded as the technical requirements and nationwide network architecture has been developed, and FirstNet is operational.** Recipients, however, must coordinate with FirstNet in advance of any strategic acquisition of broadband LTE equipment to ensure that purchases adhere to all applicable

² 47 U.S.C. § 1426(b).

³ 47 U.S.C. §§ 1401(2), 1421(a).

standards for public safety entities. Recipients with questions on FirstNet should contact info@firstnet.gov. Please refer to the [FY 2018 SAFECOM Guidance on Emergency Communications](#) for additional guidance.

Pre-Award Costs

Pre-award costs are not allowable and will not be approved, with the exception of costs resulting from pre-award grant writing services provided by an independent contractor that shall not exceed \$1,500. See Authorized Use of Contractual Grant Writers and/or Grant Managers below for additional details and restrictions.

Cost Principles

Costs charged to this award must be consistent with the Cost Principles for Federal Awards located at 2 C.F.R. Part 200, Subpart E.

Direct Costs

Planning

Planning related costs are allowed under this program only as described in this NOFO.

Organization

Organization related costs are allowed under this program only as described in this NOFO.

Equipment

Equipment related costs are allowed under this program only as described in this NOFO.

Training

Training related costs are allowed under this program only as described in this NOFO.

Exercises

Exercise related costs are allowed under this program only as described in this NOFO.

Construction and Renovation

Construction and renovation costs to achieve capability targets related to preventing, preparing for, protecting against, or responding to acts of terrorism are allowed under this program. For construction costs to be allowed, they must be specifically approved by DHS/FEMA in writing prior to the use of any program funds for construction or renovation. Limits on the total amount of grant funding that may be used for construction or renovation may apply. See Appendix C for additional details. Additionally, recipients are required to submit a SF-424C Budget and budget detail citing the project costs.

Operational Overtime

Operational Overtime costs are allowed under this program.

Travel

Domestic travel costs are allowed under this program as described in this NOFO. International travel is not an allowable cost under this program unless approved in advance by DHS/FEMA.

Maintenance and Sustainment

Maintenance and Sustainment related costs, such as maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable as described in FEMA Policy FP 205-402-125-1 (<http://www.fema.gov/media-library/assets/documents/32474>).

For additional details on allowable costs under the TSGP, see [Appendix C of this NOFO – FY 18 TSGP Funding Guidelines](#).

Management and Administration (M&A) Costs

Management and administration costs are allowed. Recipients may use *up to* 5 percent (5%) of the amount of the award for their M&A and subrecipients may use *up to* 5 percent (5%) of the amount they receive for M&A. M&A activities are those defined as directly relating to the management and administration of TSGP funds, such as financial management and monitoring. Management and administrative expenses must be based 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. M&A costs are not operational costs. They are the necessary costs incurred in direct support of the grant or as a consequence of the grant and should be allocated across the entire lifecycle of the grant. Examples include preparing and submitting required programmatic and financial reports, establishing and/or maintaining equipment inventory, documenting operational and equipment expenditures for financial accounting purposes; and responding to official informational requests from state and federal oversight authorities.

If an applicant uses an outside consultant or contractor to provide pre-award grant writing services or post-award grant management services, the following considerations and restrictions shall apply:

Authorized Use of Contractual Grant Writers and/or Grant Managers

A grant applicant may procure the services of a contractor to provide support and assistance for pre-award grant development services (grant writing) or post-award grant management and administrative services (grant management). As with all Federal grant-funded procurements, grant writer or grant management services must be procured in accordance with the Federal procurement standards at 2 C.F.R. §§ 200.317 – 200.326. See Section H regarding Procurement Integrity, particularly the sections applicable to non-state entities that discuss organizational conflicts of interest under 2 C.F.R. § 200.319(a) and traditional conflicts of interest under 2 C.F.R. § 200.318(c)(1).

DHS/FEMA considers a contracted grant-writer to be an agent of the recipient for any subsequent contracts the recipient procures under the same Federal award in which the grant-writer provided grant writing services. Federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of such specifications.

Regardless of whether an applicant or recipient uses grant writing and/or grant management services, the recipient is solely responsible for the fiscal and programmatic integrity of the grant and its authorized activities and expenditures. They must ensure adequate internal controls,

including separation of duties, to safeguard grant assets, processes, and documentation, in keeping with the terms and conditions of its award, including this NOFO, and 2 C.F.R. Part 200.

Grant Writers

Grant writing contractors may assist the applicant in preparing, writing, and finalizing grant application materials and assisting the applicant with handling online application and submission requirements in [Grants.gov](https://www.grants.gov) and [ND Grants](https://www.nd.gov). Grant writers may assist in a variety of ways up to and including the actual submission of the application. Ultimately, the applicant that receives an award is solely responsible for all grant award and administrative responsibilities.

By submitting the application, applicants are certifying all of the information contained therein is true and an accurate reflection of the organization, and that regardless of the applicant's intent, the submission of information that is false or misleading may result in actions by DHS/FEMA. These actions include but are not limited to the submitted application not being considered for award, temporary withholding of funding under the existing award pending investigation, or referral to the DHS Office of the Inspector General.

Grant Managers

Grant management contractors provide support in the day to day management of an active grant and their services may be incurred as M&A costs of the award. Additionally, recipients may retain grant management contractors at their own expense.

Pre-Award Cost of up to \$1,500 Eligible for Reimbursement

To assist applicants with the cost of grant writing services, DHS/FEMA is permitting a one-time pre-award cost of no more than \$1,500 per applicant per year for contractual grant writing services as part of the recipient's M&A costs. This is only intended to cover costs associated with a grant writer and may not be used to reimburse the applicant for their own time and effort in the development of a grant application. Additionally, the applicant may be required to pay this fee with their own funds during the application preparation and submission period; if the applicant subsequently receives an award, they may then request to be reimbursed once grant funds become available for that cost, not to exceed \$1,500. If the applicant does not receive an award, this cost will not be reimbursed by the Federal Government. The applicant must understand this risk and be able to cover this cost if an award is not made.

If an applicant intends to request reimbursement for this one-time pre-award cost, it must include this request in its application materials, including in the Budget Detail Worksheet for each Investment Justification. Failure to clearly identify this as a separate cost in the application may result in its disallowance. This is the only pre-award cost eligible for reimbursement. Recipients must maintain grant writer fee documentation including, but not limited to: a copy of the solicitation, such as a quote request, rate request, invitation to bid, or request for proposals, if applicable; a copy of the grant writer's contract agreement; a copy of the invoice or purchase order; and a copy of the cancelled check or proof of payment. These records must be made available to DHS/FEMA upon request.

Indirect (Facilities & Administrative [F&A]) Costs

Indirect costs are allowable under this program 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 DHS/FEMA before indirect costs are charged to the award.

TSGP Specific Application Instructions

All applicants will submit their TSGP grant application and associated IJs, to include detailed budgets and associated Memorandum of Understanding (MOU)/Memorandum of Agreement (MOA) as a file attachment within [ND Grants](#) prior to the application deadline.

Investment Justification (IJ)

As part of the FY 2018 TSGP application process, applicants must develop a formal IJ that addresses each initiative being proposed for funding, including a project's M&A costs. An agency may submit up to eight IJs. Agencies may also submit up to five additional IJs for projects related to law enforcement providers that are not part of the public transportation agency. Law enforcement providers may only submit projects that support the transit system's operational security capability and capacity. The IJ must demonstrate how proposed projects address gaps and deficiencies (identified in a current vulnerability assessment) in current programs and capabilities, and link to one or more core capabilities identified in the Goal.

The applicant may attach the vulnerability assessment or cite relevant sections/passages within the IJ to demonstrate the linkage between the project request and the identified vulnerability. The IJ should also describe the agency's current security posture to demonstrate why the proposed project is necessary and appropriate. The IJ must demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by FEMA. Applicants shall submit a separate IJ for each proposed project. TSGP projects must be: 1) both feasible and effective at reducing the risks for which the project was designed; and 2) able to be fully completed within the three-year period of performance. Applicants must ensure that the IJ is consistent with all requirements outlined in this NOFO.

Applicants will find an IJ Template in [Appendix E – Investment Justification Template](#). This worksheet may be used as a guide to assist applicants in IJ preparation.

Applicants must provide information in the following categories for each proposed investment:

- A. Background
- B. Strategic and Program Priorities
- C. Impact
- D. Funding/Implementation Plan

Applicants must use the following file naming convention when submitting the IJs as part of

the FY 2018 TSGP:

Region_Agency_IJ Number (Example: Chicago_CTA_IJ 1)

Operational Packages (OPacks)

Applicants that meet basic [OPack eligibility requirements](#) may elect to pursue OPack funding, such as Canine Teams, Mobile Explosive Screening Teams, and Anti-Terrorism Teams, for new capabilities as well as to sustain existing OPacks. Applicants pursuing both new OPacks and sustainment funding for existing OPacks must indicate in their IJs which is the higher priority for their agency. Additionally, applicants pursuing either new teams or sustainment of existing teams must include the number of OPack teams already in place (either funded by the agency or by the TSGP).

In addition, recipients must commit to minimum training standards to be set by the Department for all Federally-funded security positions.

Detailed Budget

Applicants must provide a detailed budget for the funds requested. The detailed budget must be submitted with the grant application as a file attachment within [ND Grants](#). Applicants will find a sample Budget Detail Worksheet in [Appendix F – Sample Budget _ Detail Worksheet](#). The budget must be complete, reasonable, and cost-effective in relation to the proposed project. The budget should provide the basis of computation of all project-related costs, any appropriate narrative, and a detailed justification of M&A costs. A recipient may not obligate, expend, or draw down funds until a budget and budget narrative have been approved by FEMA. The budget detail worksheet may be used as a guide to assist applicants in the preparation of the budget and budget narrative. Note: Design and Planning/Engineering costs must be clearly identified in a separate line item in order for partial funding to be released prior to EHP review and approval.

Detailed budgets must be submitted with the grant application as a file attachment within [ND Grants](#). Applicants must use the following file naming convention when submitting detailed budgets as part of the TSGP:

Region_Agency_IJ Number_Budget (Example: Chicago_CTA_IJ _1_Budget)

Sensitive Security Information (SSI) Requirements

A portion of the information routinely submitted in the course of applying for funding or reporting under certain programs or provided in the course of an entity's grant management activities under those programs which are under Federal control may be subject to protection under an SSI marking and must be properly identified and marked. SSI is a control designation used by DHS to protect transportation security related information. It is applied to information about security programs, vulnerability and threat assessments, screening processes, technical specifications of certain screening equipment and objects used to test screening equipment, and equipment used for communicating security information relating to air, land, or maritime transportation. Further information can be found at 49 C.F.R. Part 1520.

For the purposes of the TSGP, and due to the high-frequency of SSI found in IJs, all IJs shall be considered SSI and treated as such until they have been subject to review for SSI by DHS/FEMA. Therefore applicants shall label all application documents as SSI in accordance with 49 C.F.R. § 1520.13.

E. Application Review Information

Application Evaluation Criteria

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. 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 awards; (4) reports and findings from audits; and (5) ability to effectively implement statutory, regulatory, or other requirements.

Additionally, FY 2018 TSGP applications will be evaluated through a review process for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed investments. For additional information, please see [Appendix D - Evaluation Plan, Scoring Criteria, and Score Sheet](#).

Applications requesting funds will be reviewed and selected based on the following criteria:

- 1. Risk Group Score.** The agency's risk group score is a score of 1-10 generated for each transit agency based on assessed risk to the transit system. This score is calculated by a risk process developed and maintained by DHS/FEMA and TSA.
- 2. Funding Priority Areas.** Projects will be awarded up to seven (7) points based on the extent to which they align with the TSGP Funding Priority Areas (see Appendix B – FY 2018 TSGP Program Priorities).
- 3. Risk Mitigation Score.** Projects will be evaluated based on the potential risk mitigation of the project (as determined by the information provided in the IJ). This score has several components, and is calculated by the average of the applicable sub-components described below. The total possible score for risk mitigation is 28.
 - a. Cost effectiveness.** Projects will be awarded up to 12 points based on the expected impact on security relative to the investment.
 - b. Ability to reduce risk of catastrophic events.** Projects will be awarded up to 12 points based on the applicant's ability to reduce risk associated with potential terrorist attacks and all other types of hazards.
 - c. Sustainability without additional Federal funds and leveraging of other funding.** Projects will be awarded up to two (2) points based on the extent to which the applicant exhibits a likelihood of success, or continued success, without requiring additional Federal assistance.
 - d. Timelines.** Projects will be awarded up to two (2) points based on an evaluation of the applicant's ability to complete the proposed project within submitted timeframes, and how quickly the project can be implemented once funding is received due to planning activities, contracting issues, construction requirement,

or other such factors.

- 4. Regional Collaboration.** Projects will be given an additional 0-1.5 points based on the degree of collaboration with other regional partners.

DHS/FEMA headquarters grants management specialists will also conduct a financial risk assessment using the following criteria:

- Allowability, allocability, and financial reasonableness of the proposed budget and investment information, and
- Whether the recipient meets the financial and legal requirements listed in 2 C.F.R. Part 200.

Review and Selection Process

Recipients must comply with all administrative requirements described herein — including the submission of IJs, budgets, and other application materials as required. Having met all administrative requirements, the application will be scored based on the methodology described above, which ensures consistent and accurate evaluations of projects and proposals.

Please note TSGP does not have a cost-match requirement and identifying a non-Federal cost match will not be considered during the application review. However, recipients are strongly encouraged to demonstrate any additional sources of funding for proposed projects. Demonstrating this layered approach to project funding will help to ensure vital projects are completed. Grant projects must be: 1) both feasible and effective at reducing the risks for which the project was designed; and 2) able to be fully completed within the three-year period of performance.

DHS/FEMA will use the information provided in the application, as well as any supporting documentation, to determine the feasibility and effectiveness of the grant project. Information that would assist in the feasibility and effectiveness determination includes the following:

- Scope of work (purpose and objectives of the project, identification of what is being protected)
- Desired outcomes, including expected long-term impact where applicable
- Summary of status of planning and design accomplished to date (e.g., included in a capital improvement plan)
- Previous project phases completed
- Evidence of linkage to a recent vulnerability assessment
- Description of current security posture of the requesting agency
- Project schedule

Recipients are expected to conform, as applicable, with accepted engineering practices, established codes, standards, modeling techniques, and best practices.

The following process will be used to make awards for the program:

- DHS/FEMA will verify compliance with each of the administrative and eligibility criteria identified in the NOFO.
- Eligible applications will be reviewed by a National Review Panel (NRP) to

determine the risk mitigation and regional collaboration scores. The NRP will consist of officials from various Federal agencies. Each panelist will independently review each application and score it based on the criteria outlined above using a standard scoring sheet.

- The NRP will meet to review and compare scores with discussion of project criteria. Each panelist will then confirm their final scores. Panelist scores will be averaged to obtain scores for each criterion on each project.
- DHS/FEMA will calculate a total score to aid with funding selections. The total score will consist of four individual parts: an agency-based risk score, an alignment to the funding priority areas score, a score based on project risk mitigation, and the degree of regional collaboration.
- Final project scores will be calculated as follows:

$$\begin{aligned} & \textit{Risk Group Score} \\ & + \\ & \textit{Funding Priority Area Score} \\ & + \\ & \textit{Risk Mitigation Score} \\ & + \\ & \textit{Regional Collaboration Component} \end{aligned}$$

- The NRP results will be reviewed by an Executive Committee. The Executive Committee, made up of senior leadership from DHS/FEMA and TSA, will review the NRP's scoring summary and funding recommendations.
- The output of the Executive Committee review will be the final slate of recommended projects, the associated funding recommendations and official comments and justifications. DHS/FEMA and TSA will brief the final results of the Executive Committee's review, approved projects and funding to senior DHS/FEMA leadership through multiple briefings. Ultimately, TSGP authorizing statutes place final funding determinations at the discretion of the Secretary of Homeland Security.
- The final slate of approved projects will then be forwarded to DHS/FEMA for final award processing.

Supplemental Financial Integrity Review

Prior to making a Federal award where the Federal share is expected to exceed the simplified acquisition threshold, currently \$150,000, DHS/FEMA is required to review and consider any information about the applicant in the [Federal Awardee Performance and Integrity Information System \(FAPIIS\)](#), which 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 FAPIIS information, in 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.

All investments selected for recommendation will also undergo an additional risk review

conducted by the FEMA HQ Grants Management Specialist to evaluate the risk for noncompliance in carrying out the Federal award. Using their subject matter expertise, the questions the FEMA HQ Grants Management Specialist will assess are:

- Is the applicant on any exclusion lists as identified in the System for Award Management (Sam.gov)?
- If the applicant has received Federal funding in the past, has the applicant performed all audits required by the Single Audit requirements under 2 C.F.R. Part 200, Subpart F?
- Has the applicant provided sufficient budget information and justification as required by the NOFO?
- Are the costs proposed by the applicant in the budget information and justification allowable and reasonable based on the criteria set forth in this NOFO and the Cost Principles located at 2 C.F.R. Part 200, Subpart E?
- Is the budget representative of the total cost of performance of the projects?
- If indirect costs are included, has the applicant provided an approved Indirect Cost Rate agreement?
- Is the applicant delinquent on any Federal debt?
- Has the applicant had substandard performance in a prior award?
- Is the applicant on the Do Not Pay List?

Based on the outcome of this review, DHS/FEMA may determine that it will not make an award to an applicant that poses a risk of noncompliance. DHS/FEMA may also determine that it will make an award to an at-risk applicant, subject to additional terms and conditions as described in 2 C.F.R. § 200.207.

F. Federal Award Administration Information

Notice of Award

Notification of award approval is made through the ND Grants system through an automatic e-mail to the award recipient point of contact (the “authorized official”) listed in the initial application. The “award date” for TSGP will be the date that DHS/FEMA approves the award. The award recipient should follow the directions in the notification to confirm acceptance of the award.

Funds will remain on hold until the recipient accepts the award through the ND Grants system and all other conditions of award have been satisfied, or the award is otherwise rescinded. Failure to accept the grant award within the 90 day timeframe may result in a loss of funds.

Recipients must accept their awards no later than 90 days from the award date. The recipient shall notify the awarding agency of its intent to accept and proceed with work under the award through the ND Grants system. Instructions on accepting or declining an award in the ND Grants system, can be found in the [ND Grants Grantee Training Manual](#).

Administrative and National Policy requirements

All successful applicants for all DHS/FEMA grant and cooperative agreements are required to comply with DHS Standard Administrative Terms and Conditions, which are available online at:

[DHS Standard Terms and Conditions.](#)

The applicable DHS Standard Administrative Terms and Conditions will be those in effect at the time in which the award was made.

Before accepting the award, the AOR should carefully review the award package. The award package includes instructions on administering the grant award, as well as the terms and conditions with which the recipient must comply. Recipients must accept all conditions in this NOFO as well any Special Terms and Conditions in the Notice of Award to receive an award under this program.

Reporting

Recipients are required to submit various financial and programmatic reports as a condition of award acceptance. Future awards and fund drawdowns may be withheld if these reports are delinquent.

Federal Financial Reporting Requirements

Federal Financial Report (FFR)

Recipients must report obligations and expenditures on a quarterly basis through the FFR (SF-425) to DHS/FEMA. Recipients must file the FFR electronically using the Payment and Reporting System (PARS). A FFR must be submitted quarterly throughout the period of performance, including partial calendar quarters, as well as for periods where no grant award activity occurs. The final FFR is due 90 days after the end of the performance period. Future awards and fund drawdowns may be withheld if these reports are delinquent, demonstrate lack of progress, or are insufficient in detail.

The Federal Financial Reporting Form (FFR) is available online at: <https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html#sortby=1>, SF-425 OMB #4040-0014.

Financial Reporting Periods and Due Dates

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

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 GAO’s 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, located at <https://www.ecfr.gov/cgi-bin/text->

[idx?node=sp2.1.200.f.](#)

Program Performance Reporting Requirements

Performance Progress Report (PPR)

Recipients are responsible for providing updated performance reports on a biannual basis. Recipients must submit the following in ND Grants.

The PPR should include the following:

- Status Summary, to include:
 - A brief narrative of the overall project status; and
 - Identification of accomplishments and milestones achieved as they relate to the approved project.
 - Description of any potential issues that may affect project completion.
- Best Practices / Lessons Learned Summary: The summary should describe any best practices or lessons learned identified to date through the program. The purpose of this information is to develop and enhance guidance materials, tools, templates, and lessons learned and best practices summaries.
- Issues List: The list should identify any program-related challenges that may require assistance or impact successful and on time completion of the funded project.

Performance Reporting Periods and Due Dates

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

Reporting Period	Report Due Date
January 1 – June 30	July 30
July 1 – December 31	January 30

Closeout Reporting Requirements

DHS/FEMA will close out the grant award when all applicable administrative actions and all required work of the TSGP award have been completed by the recipient. This section summarizes the actions that recipients must take to complete the closeout process in accordance with 2 C.F.R. § 200.343 at the end of the grant's period of performance or the expiration of an approved extension via Grant Amendment Notice issued to close out the grant.

Within 90 days after the end of the period of performance, or after an amendment has been issued to close out a grant, whichever comes first, recipients must submit a final FFR and final progress report detailing all accomplishments and a qualitative summary of the impact of those accomplishments throughout the period of performance, as well as the following documentation:

- 1) Final request for payment, if applicable;
- 2) SF-425 – Final Federal Financial Report;
- 3) Final Performance Progress Report detailing project accomplishments throughout the period of performance with ties back to the original gaps laid out in the investment

- justification(s);
- 4) A qualitative narrative summary on the impact of those accomplishments throughout the entire period of performance submitted to the respective GPD Program Analyst; and
 - 5) Other documents required by program guidance or terms and conditions of the award.

Additionally, recipients must liquidate all obligations incurred under the TSGP award no later than 90 calendar days after the end date of the period of performance or the expiration of an approved extension via Grant Amendment Notice that closes out the award, whichever comes first. If the recipients fails to liquidate its obligations within this time period, DHS/FEMA may disallow the costs associated with those unliquidated obligations. Recipients are also responsible for promptly returning to DHS/FEMA the balance of any funds that have been drawn down, but remain unliquidated.

After these reports have been reviewed and approved by DHS/FEMA, a close out notice will be completed. The notice will indicate the period of performance as closed, list any remaining funds the recipient has not drawn down that will be deobligated, address requirements for record retention, and explain disposition and reporting requirements for any equipment or real property purchased using TSGP funding.

If DHS/FEMA has made reasonable attempts through multiple contacts to close out awards within the required 180 days, DHS/FEMA may waive the requirement for a particular report and administratively close the award. If this action is taken, consideration for subsequent awards to the recipient may be impacted or restricted.

In addition, any TSGP recipient that issues subawards to any subrecipients is responsible for closing out those subawards as described in 2 C.F.R. § 200.343. TSGP recipients must ensure that they complete the closeout of their subawards in time to submit all necessary documentation and information to DHS/FEMA during the closeout of their own grant award.

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.

G. DHS Awarding Agency Contact Information

Contact and Resource Information

Centralized Scheduling and Information Desk (CSID)

CSID is a non-emergency comprehensive management and information resource developed by DHS/FEMA for grants stakeholders. CSID provides general information on all FEMA grant programs and maintains a comprehensive database containing key personnel contact

information at the Federal, state, and local levels. When necessary, recipients will be directed to a Federal point of contact who can answer specific programmatic questions or concerns. CSID can be reached by phone at (800) 368-6498 or by e-mail at askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

GPD Grant Operations Division

GPD's Grant Operations Division Business Office provides support regarding financial matters and budgetary technical assistance. Additional guidance and information can be obtained by contacting the FEMA Call Center at (866) 927-5646 or via e-mail to ASK-GMD@fema.gov.

FEMA Regional Offices

FEMA Regional Offices also may provide fiscal support, including pre- and post-award administration and technical assistance such as conducting cash analysis, financial monitoring, and audit resolution to the grant programs included in this solicitation. GPD will provide programmatic support and technical assistance. A list of contacts in FEMA Regions is available online at <https://www.fema.gov/fema-regional-contacts>.

GPD Environmental Planning and Historic Preservation (GPD EHP)

The FEMA GPD EHP Team provides guidance and information about the EHP review process to recipients and subrecipients. All inquiries and communications about GPD projects or the EHP review process, including the submittal of EHP review materials, should be sent to gpdehpinfo@fema.gov. EHP Technical Assistance, including the EHP Screening Form, can be found online at: <https://www.fema.gov/media-library/assets/documents/90195>.

Systems Information

Grants.gov

For technical assistance with [Grants.gov](https://www.grants.gov), please call the customer support hotline at (800) 518-4726.

Non-Disaster (ND) Grants

For technical assistance with the ND Grants system, please contact the ND Grants Helpdesk at ndgrants@fema.gov or (800) 865-4076, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

Payment and Reporting System (PARS)

DHS/FEMA uses the Payment and Reporting System ([PARS](#)) for financial reporting, invoicing and tracking payments. DHS/FEMA uses the Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment to recipients. To enroll in the DD/EFT, the recipient must complete a Standard Form 1199A, Direct Deposit Form.

H. Additional Information

National Preparedness

The National Preparedness Goal defines what it means for the [whole community](#) to be prepared for all types of disasters and emergencies. The National Preparedness System is the instrument

the Nation employs to build, sustain, and deliver core capabilities in order to achieve the Goal of a secure and resilient Nation. DHS/FEMA coordinates with local, state, territory, and tribal governments as well as the private and nonprofit sectors to facilitate whole community, risk driven, and capabilities-based approach to preparedness. The FY 2018 TSGP plays an important role in the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities. Core capabilities are essential for the execution of critical tasks identified in the National Planning Frameworks for each of the five mission areas outlined in the National Preparedness Goal. Information on the National Preparedness System can be found at <https://www.fema.gov/national-preparedness-system>. Additional details regarding the National Preparedness System and how it is supported by the TSGP can be found in [Appendix B – Program Priorities](#).

Active Shooter Preparedness

DHS aims to enhance national preparedness through a whole community approach by providing the necessary products, tools, and resources to help all stakeholders prepare for and respond to an active shooter incident. To that end, DHS has developed a comprehensive “Active Shooter Preparedness” website, which includes informational resources. The website address is: <https://www.dhs.gov/active-shooter-preparedness>.

In addition, within the Homeland Security Information Network (HSIN), the Joint DHS and FBI Countering Violent Extremism (CVE) and Active Shooter Web Portal provides a restricted-access forum to share Unclassified for Official Use Only (FOUO), Sensitive but Unclassified (SBU), and Law Enforcement Sensitive (LES) Information. The portal provides users and training practitioners with accurate, appropriate, relevant CVE and Active Shooter training development resources, subject matter expert information, and outreach initiatives. It also has forums to provide feedback, products useful to others, and allows participants to ask questions concerning CVE or the Active Shooter Program. Persons with a job-related duty, public service interest, or who support a CVE and/or Active Shooter program can request access into this Portal. Additional information can be found at: <https://www.dhs.gov/cveas-portal#>. To address training needs associated with active shooter incidents, FEMA’s Emergency Management Institute provides a free, web-based training course entitled *IS-907: Active Shooter: What You Can Do*, available at the following website: <https://training.fema.gov/is/courseoverview.aspx?code=IS-907>.

Soft Targets and Crowded Places

There are continued and growing threats facing Soft Targets and Crowded Places (ST-CP) throughout the nation. ST-CPs are those locations or environments that are easily accessible to large numbers of people on a predictable or semi-predictable basis that have limited security or protective measures in place. These locations are vulnerable to attack using simple tactics and readily accessible weapons such as small arms, edged weapons, and vehicles as a weapon, improvised explosive devices, and unmanned aerial systems. ST-CPs can include places such as town centers, shopping malls, open-air venues, outside hard targets/venues perimeters, and other places of meeting and gathering. DHS is committed to reducing the risk of attacks against ST-CPs and the impact of attacks if they do occur. However, the protection and security of ST-CPs is a shared responsibility among whole community partners including: the public, ST-CP owners and operators, security industry partners, the Federal Government, and State, local, tribal, and

territorial (SLTT) government partners. States, territories, urban areas, and public and private sector partners are encouraged to identify security gaps and build capabilities that address security needs of ST-CP, understanding the unique challenges related to protecting locations that are open to the public. States, territories, urban areas, and public and private sector partners are also encouraged to use resources to instill a culture of awareness, vigilance, and preparedness. For more information and additional resources please see the Department of Homeland Security's [Hometown Security Program](#).

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 fully adhered to the 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 conditions as described in 2 C.F.R. § 200.207 or 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 will include a review of recipients' procurement practices as part of the normal monitoring activities. All procurement activity must be conducted in accordance with Federal Procurement Standards at 2 C.F.R. §§ 200.317 – 200.326. Select requirements under these standards are listed below. The recipient must comply with all requirements, even if they are not listed below.

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 procurement of recovered materials, and 2 C.F.R. § 200.326 regarding required contract provisions.

All other non-Federal entities, such as tribes, must use their own documented procurement procedures which reflect applicable state, local, 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 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

Among the requirements of 2 C.F.R. § 200.319(a) applicable to all non-Federal entities other than States, in order 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 such procurements. FEMA considers this an organizational conflict 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 such former employees worked on such 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 this contract was procured in compliance with 2 C.F.R. §§ 200.317 – 200.326, Federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of such 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 Section D.

Additionally, some of the 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, 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 its application 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 for violations of such standards by officers, employees, or agents of the non-Federal entity.

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 or appears to be 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 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 will satisfy the Federal requirements for full and open competition provided that the recipient 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 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 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 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, it is recommended that recipients discuss their procurement plans with the FEMA Grant Programs Directorate.

Documentation

Non-Federal entities are required to maintain and retain the following:

- Backup documentation, such as bids and quotes.
- Cost/price analyses on file for review by Federal personnel, if applicable.
- Other documents required by Federal regulations applicable at the time a grant is awarded to a recipient.

FEMA requires that non-Federal entities maintain the following documentation for Federally funded purchases:

- Specifications
- Solicitations
- Competitive quotes or proposals
- Basis for selection decisions
- Purchase orders
- Contracts
- Invoices
- Cancelled checks

Non-Federal entities should 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 fully document all purchases will find their expenditures questioned and subsequently disallowed.

Monitoring and Evaluation

Recipients will be monitored programmatically and financially on an annual and as needed basis by DHS/FEMA staff to ensure that the activities and project goals, objectives, performance requirements, timelines, milestone completion, budgets, and other related program criteria are being met.

Monitoring may be accomplished through either a desk-based review or on-site 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 will identify areas where technical assistance, corrective actions and other support may be needed.

As part of its grant oversight responsibility, FEMA is conducting a series of grant effectiveness case studies jointly with grant recipients to highlight how states and urban areas have used federal grants to improve preparedness. The purpose of the project is to better understand the factors that grant recipients consider when determining which grant projects to fund, understand how recipients measure grant effectiveness, and document key findings and success stories that will help both grant recipients and FEMA more effectively communicate the importance of Federal grant programs to policymakers and the public. Although not mandatory, recipients are encouraged to participate given the mutual benefits to be gained from this collaborative effort.

Conflicts of Interest in the Administration of Federal Awards or Subawards

For conflicts of interest under grant-funded procurements and contracts, please refer to the section on Procurement Integrity in this NOFO and 2 C.F.R. §§ 200.317 – 200.326.

To eliminate and reduce the impact of conflicts of interest in the subaward process, recipients and pass-through entities must follow their own policies and procedures regarding the elimination or reduction of conflicts of interest when making subawards. Recipients and pass-through entities also are required to follow any applicable state, local, territorial or tribal statutes or regulations governing conflicts of interest in the making of subawards.

The recipient or pass-through entity must disclose to DHS/FEMA, in writing, any real or potential conflict of interest as defined by the Federal, state, local, territorial or tribal statutes or regulations or their own existing policies, which may arise during the administration of the Federal award. Recipients and pass-through entities must disclose any real or potential conflicts to their Program Analyst within five (5) days of learning of the conflict of interest. Similarly, subrecipients must disclose any real or potential conflict of interest to the pass-through entity as required by the recipient's conflict of interest policies, or any applicable state, local, or Tribal statutes or regulations.

Conflicts of interest may arise during the process of DHS/FEMA making a Federal award in situations where an employee, officer, or agent, any members of his or her immediate family, his or her partner has a close personal relationship, a business relationship, or a professional relationship, with an applicant, subapplicant, recipient, subrecipient, or DHS/FEMA employee.

Extensions

Period of Performance Extensions

Extensions to the initial period of performance identified in the award will only be considered through formal, written requests to the recipient's respective FEMA HQ Program Analyst and must contain specific and compelling justifications as to why an extension is required.

Recipients are advised to coordinate with the FEMA HQ Program Analyst as needed, when preparing an extension request. All extension requests must address the following:

- 1) Grant program, fiscal year, and award number;
- 2) 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;
- 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, as described in the investment justification and approved by DHS/FEMA.

Extension requests will be granted only due to compelling legal, policy, or operational

challenges. Extension requests will only be considered for the following reasons:

- Contractual commitments by the grant recipient with vendors or subrecipients prevent completion of the project within the existing period of performance;
- The project must undergo a complex environmental review that cannot be completed within this timeframe;
- Projects are long-term by design and therefore acceleration would compromise core programmatic goals; and
- Where other special circumstances exist.

The recipient must submit all proposed extension requests to DHS/FEMA for review and approval no later than 120 days prior to the end of the period of performance. In accordance with GPD policy, extensions are typically granted for no more than a six (6) month time period.

Appendix A – FY 2018 TSGP Eligible Rail, Intra-City Bus, and Ferry Public Transportation Agencies

State	Urban Area	Eligible System	Asset on DHS TTAL ¹
AZ	Phoenix Area	City of Phoenix Public Transit Department	
		Valley Metro Regional Public Transportation Authority (Valley Metro)	
	Tucson Area	City of Tucson Transit	
CA	Fresno Area	Fresno Area Express	
	Greater Los Angeles Area (Los Angeles/Long Beach and Anaheim/Santa Ana UASI Areas)	City of Los Angeles Department of Transportation	
		Foothill Transit	
		Long Beach Transit	
		Los Angeles County Metropolitan Transportation Authority	X
		Montebello Bus Lines	
		Omnitrans (San Bernardino)	
		Orange County Transportation Authority (OCTA)	
		Santa Monica's Big Blue Bus	
		Southern California Regional Rail Authority (Metrolink)	
	Sacramento Area	Sacramento Regional Transit District	
	San Diego Area	North San Diego County Transit District (NCTD)	
		San Diego Metropolitan Transit System (MTS)	
	San Francisco Bay Area	Alameda-Contra Costa Transit District (AC Transit)	
		Altamont Commuter Express (ACE)	
		Central Contra Costa Transit Authority	
		Golden Gate Bridge, Highway and Transportation District	
		Peninsula Corridor Joint Powers Board (Caltrain)	
		San Francisco Bay Area Rapid Transit District (BART)	X
		San Francisco Municipal Railway (MUNI)	
		San Mateo County Transit Authority (SamTrans)	
		Santa Clara Valley Transportation Authority (VTA)	
		Transbay Joint Powers Authority	
Water Emergency Transit Authority			
CO	Denver Area	Regional Transportation District	
DC/ MD/ VA	Greater National Capital Region (National Capital Region and Baltimore UASI Areas)	Arlington Transit (ART)	
		City of Alexandria (Alexandria Transit Company)	
		Fairfax County Department of Transportation	
		Maryland Transit Administration (MTA)	
		Montgomery County Department of Transportation	
		Potomac and Rappahannock Transportation Commission	
		Prince George's County Department of Public Works and Transportation	
		Virginia Railway Express (VRE)	
Washington Metropolitan Area Transit Authority	X		
FL	Jacksonville Area	Jacksonville Transportation Authority	
		Broward County Division of Mass Transit	

¹ Agency indicated has one or more Top Transit Asset List (TTAL) assets within its system

State	Urban Area	Eligible System	Asset on DHS TTAL ¹
	Miami/Fort Lauderdale Area (Miami and Fort Lauderdale UASI)	Miami-Dade Transit	
		South Florida Regional Transportation Authority (Tri-Rail)	
	Orlando Area	Central Florida Regional Transportation Authority	
		Central Florida Commuter Rail Transit (SunRail)	
	Tampa Area	Hillsborough Area Regional Transit Authority (HART)	
		Pinellas Sun Coast Transit Authority	
GA	Atlanta Area	Georgia Regional Transportation Authority	
		Metropolitan Atlanta Rapid Transit Authority (MARTA)	X
HI	Honolulu Area	City and County of Honolulu Department of Transportation Services	
IL	Urbana-Champaign Area	Champaign-Urbana Mass Transit District	
IL/IN	Chicago Area	Chicago Transit Authority (CTA)	X
		Northeast Illinois Commuter Railroad Corporation (METRA)	
		Northern Indiana Commuter Transportation District (NICTD)	
		PACE Suburban Bus	
IN	Indianapolis Area	Indianapolis Public Transportation Corporation	
KY	Louisville Area	Transit Authority of River City	
KS	Kansas City Area	Kansas City Streetcar	
LA	New Orleans Area	Jefferson Parish Department of Transportation	
		New Orleans Regional Transit Authority (NORTA)	
MA	Boston Area	Massachusetts Bay Transportation Authority (MBTA)	X
	Springfield Area	Pioneer Valley Transit Authority	
MI	Detroit Area	City of Detroit Department of Transportation	
		Detroit Transportation Corporation	
		Suburban Mobility Authority for Regional Transportation	
	Lansing Area	Capital Area Transportation Authority	
MN	Twin Cities	Metro Transit	
MO	Kansas City Area	Kansas City Area Transportation Authority	
MO-IL	St. Louis Area	Bi-State Development Agency (Metro)	
		Madison County Transit District	
NC	Charlotte Area	Charlotte Area Transit System (CATS)	
NM	Albuquerque Area	Sun Tran of Albuquerque	
NV	Las Vegas Area	Regional Transportation Commission of Southern Nevada	
	Reno Area	Regional Transportation Commission of Washoe County	
NY	Albany Area	Capital District Transportation Authority	
	Buffalo Area	Niagara Frontier Transportation Authority	
	Rochester Area	Rochester Genesee Regional Transportation Authority	
NY/NJ / CT	New York City/Northern New Jersey Area (New York City and Jersey City/Newark UASI Areas)	Connecticut Department of Transportation	
		Connecticut Transit	
		Metropolitan Transportation Authority (MTA) (all components)	X
		New Jersey Transit Corp. (NJT)	X
		New York City Department of Transportation	X
		Port Authority of New York and New Jersey (PANYNJ)	X
	Westchester County Department of Transportation		
OH	Cincinnati Area	Southwest Ohio Regional Transit Authority	
		Transit Authority of Northern Kentucky	
	Cleveland Area	The Greater Cleveland Regional Transit Authority	

State	Urban Area	Eligible System	Asset on DHS TTAL ¹
	Columbus Area	Central Ohio Transit Authority	
	Dayton Area	Greater Dayton Regional Transit Authority	
OR	Eugene Area	Lane Transit District	
	Portland Area	Clark County Public Transportation Benefit Area (C-TRAN) Tri-County Metropolitan Transportation District (Tri-Met)	
PA	Pittsburgh Area	Port Authority Of Allegheny County	
PA/D E/ NJ	Philadelphia Area	Delaware River Port Authority (DRPA)	X
		Delaware Transit Corporation	
		New Jersey Transit	X
		Pennsylvania Department of Transportation Southeastern Pennsylvania Transportation Authority	X
PR	San Juan Area	Metropolitan Bus Authority	
		Puerto Rico Highway and Transportation Authority (heavy rail)	
RI	Providence Area	Rhode Island Public Transit Authority	
TN	Memphis Area	Memphis Area Transit Authority	
	Nashville Area	Nashville Metropolitan Transit Authority	
TX	Austin Area	Capital Metropolitan Transportation Authority	
	Dallas/Fort Worth/Arlington Area	Dallas Area Rapid Transit (DART)	
		Fort Worth Transportation Authority (The T)	
		Trinity Railway Express (TRE)	
	El Paso Area	Mass Transit Department City of El Paso	
	Houston Area	Metropolitan Transit Authority of Harris County	
San Antonio Area	VIA Metropolitan Transit		
UT	Salt Lake City Area	Utah Transit Authority	
VA	Norfolk Area	Hampton Roads Transit	
	Richmond Area	Greater Richmond Transit Company	
WA	Seattle Area	Central Puget Sound Regional Transit Authority (Sound Transit)	
		King County Department of Transportation	
		Pierce County Public Transportation Benefit Area Corporation (Pierce Transit)	
		Snohomish County Transportation Benefit Area Corporation (Community Transit) Washington State Ferries (WSF)	
	Spokane Area	Spokane Transit Authority	
WI	Madison Area	Madison Metro Transit	
	Milwaukee Area	Milwaukee County Transit System	

Appendix B – FY 2018 TSGP Program Priorities

Alignment of TSGP to the National Preparedness System

The FY 2018 TSGP plays an important role in the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities. Core capabilities are essential for the execution of critical tasks for each of the five mission areas outlined in the Goal. TSGP's allowable costs support efforts to build and sustain core capabilities across the five mission areas.

To support building, sustaining, and delivering these core capabilities recipients will use the components of the National Preparedness System. The components of the National Preparedness System are: Identifying and Assessing Risk; Estimating Capability Requirements; Building and Sustaining Capabilities; Planning to Deliver Capabilities; Validating Capabilities; and Reviewing and Updating. For more information on each component, read the National Preparedness System Description available at <http://www.fema.gov/national-preparedness-system>.

Validating Capabilities

Recipients should identify long-term training and exercise priorities. These priorities should address capability targets, gaps identified through applicable risk assessments, and areas for improvement identified from real-world events and exercises. Recipients should document these priorities and schedule of exercise events and supporting training activities in a Multi-year Training and Exercise Plan (TEP). Information related to Multi-year TEPs and Training and Exercise Planning Workshops (TEPWs) can be found on the Homeland Security Exercise and Evaluation Program (HSEEP) website at <https://www.fema.gov/exercise>.

Exercises implemented with grant funds should examine, validate and/or address the performance of capability against the level of capabilities required. Grant recipients should develop and maintain a progressive exercise program consistent with Homeland Security Exercise and Evaluation Program (HSEEP) (<https://www.fema.gov/exercise>) and in support of the National Exercise Program (NEP). The NEP serves as the principal exercise mechanism for examining national preparedness and measuring readiness. Recipients are strongly encouraged to nominate exercises into the NEP. For additional information on the NEP, please refer to (<http://www.fema.gov/national-exercise-program>)

Reporting

In order to report on exercises from the exercise program, recipients must submit an After-Action Report/Improvement Plan (AAR/IP) to hseep@fema.gov, no later than 90 days after completion of the grant-funded exercise conducted within the TSGP period of performance. Recipients are reminded of the importance of implementing corrective actions iteratively throughout the progressive exercise cycle. Recipients are encouraged to use the HSEEP AAR/IP template located at <https://www.fema.gov/exercise> and use the Corrective Action Program (CAP) System at <https://preptoolkit.fema.gov/web/hseep-resources/home>, as a means to track the implementation of corrective actions listed in the AAR/IP.

Strengthening Governance Integration

DHS/FEMA preparedness grant programs are intended to build and sustain an integrated

network of national capabilities across all levels of government and the whole community. Disparate governance structures must be integrated and refined to ensure resources are targeted to support the most critical needs of a community based on risk driven, capabilities-based planning. Strong and inclusive governance systems better ensure that disparate funding streams are coordinated and applied for maximum impact. In addition to participating in their RTSWG, eligible Transit entities should actively participate with the surrounding Urban Area Security Initiative (UASI) groups, applicable Area Maritime Security Committee, and other established ad hoc security working groups. Grant recipients are required to participate in the Threat and Hazard Identification and Risk Assessment (THIRA) and State Preparedness Report (SPR) processes by coordinating with the appropriate State Administrative Agency (SAA) or Urban Area Working Group.

DHS/FEMA requires that all governance processes that guide the allocation of preparedness grant funds adhere to the following guiding principles:

- *Coordination of Investments* – resources must be allocated to address the most critical capability needs.
- *Transparency* – stakeholders must be provided visibility on how preparedness grant funds are allocated and distributed, and for what purpose.
- *Substantive Local Involvement* – the tools and processes that are used to inform the critical priorities, which DHS/FEMA grants support, must include local government representatives. At the state and regional levels, local risk assessments must be included in the overarching analysis to account for the threats and hazards of most concern to the jurisdiction.
- *Addressing Local Capability Gaps* – Local level entities shall evaluate and address their unique preparedness gaps, as well as maintain and sustain existing capabilities.
- *Support of Regional Coordination* – Inter/intra-state partnerships and dependencies at the state and regional level, including those within metropolitan areas, must be recognized.

Risk-Based Funding

Based upon ongoing intelligence analysis, extensive security reviews, consultations with operations and security officials of mass transit and passenger rail agencies, state and local government officials, and Federal security partners, DHS/FEMA will focus its available transit security grant dollars on the highest-risk systems in our country's largest metropolitan areas, and projects that have the highest efficacy in reducing risk as evidenced by their linkage to a recent vulnerability assessment and the agency's current security posture. Eligible agencies were identified using a comprehensive, empirically-grounded risk analysis model.

Top Transit Asset List (TTAL) Remediation

DHS has identified critical infrastructure assets of national concern through the TTAL. Critical infrastructure assets are those vital to the functionality and continuity of a major transit system such that their incapacitation or destruction would have a debilitating effect on security, national economic security, public health or safety, or any combination thereof. This specifically includes critical underwater tunnels, underground stations or tunnels, shared transportation facilities and other interdependencies of the system, critical systems, and any other asset or

facility that would severely impact the overall system if lost or damaged. DHS uses the TTAL to target funding to the remediation of those assets on the list with an informed and risk-based approach.

The TTAL is dynamic in nature and will be adjusted, as appropriate. Transit agencies may submit assets they feel should be considered for inclusion on the TTAL by sending an email to TSAGrants@tsa.dhs.gov.

The TTAL is considered SSI. See 49 C.F.R. Part 1520 and www.tsa.gov/for-industry/sensitive-security-information for more information. Agencies that have assets on the TTAL are identified in [Appendix A – Eligible Rail, Intra-City Bus, and Ferry Transit Agencies](#). TSA will provide those agencies with the list of their assets that appear on the TTAL in accordance with proper SSI handling.

Agencies that own a TTAL asset, or have written agreement(s) with the asset owner, and have complete remediation plans, may apply for funds to remediate the asset itself. When applying for remediation funds, agencies must include a remediation plan for review and approval within their IJ. If an agency owns an asset that is not on the TTAL, they may still submit remediation projects for those assets to be considered, either as a potential addition to the TTAL, or as part of the non-TTAL capital projects review. If requesting funds for consequence management, applicants must provide in the IJ a detailed description identifying the prevention and protection measures already addressed, such as closed-circuit television (CCTV), access control, intrusion detection, physical hardening, etc. Prevention and protection measures must be implemented or funded to be completed prior to requesting consequence management activities.

Regional Security Coordination

DHS/FEMA encourages all TSGP applicants to demonstrate robust regional coordination and an investment strategy that institutionalizes regional security strategy integration. DHS/FEMA will work with TSGP applicants to strengthen and support regional consultation processes. Close coordination of the Federal TSGP investments is encouraged in all applications.

IJs that are developed collaboratively and that involve multiple eligible entities in implementation will result in funding preferences, as reflected by the regional collaboration component of the overall project score. Examples of regional efforts include regional drills and exercises, security training courses, interoperable communications, and public awareness campaigns.

Regional Transit Security Working Group (RTSWG) Membership

The following entities must be invited to actively participate in the RTSWG and have full membership rights in the group: eligible transit agencies and their security providers, eligible law enforcement agencies (as subrecipients), the state's Office of Homeland Security, and Amtrak. For agencies that share assets with Amtrak, close coordination on the expenditure of funds for security enhancements at shared facilities must occur. The RTSWG must extend an invitation to Urban Area Working Groups (UAWGs) and freight railroad carriers if their operations intersect with that of the transit agencies.

The RTSWG must also extend an invitation to the SAA to serve as a co-chair on the RTSWG with any other current chairs/co-chairs established by the region; however, the SAA is under no obligation to accept this position. It is the responsibility of the applicable co-chairs to serve as facilitators and coordinators for the RTSWG meetings and any other regional transit security grants activities as determined by each RTSWG. TSA and FEMA will serve as ex-officio members of the RTSWG.

Regional Transit Security Strategy (RTSS)

Each RTSWG is required to develop and update a RTSS at least every three years. The RTSS is not required to be submitted as part of the TSGP application, but must be made available to DHS/FEMA upon request. As the owners and operators of infrastructure that is vital to the well-being of the states and urban areas they serve, it is imperative that transit systems be incorporated into regional preparedness planning efforts. A template for developing the RTSS can be found at https://www.fema.gov/pdf/government/grant/2011/fy11_tsgp_rtss.pdf.

The RTSS should serve as the integration point between individual, risk-based plans, and the overall security goals and objectives of the region. Therefore, the RTSS must demonstrate a clear linkage to the applicable state and urban area homeland security strategies developed or currently being developed. It is expected that the security plans and the RTSS will serve as the basis on which funding is allocated to address regional transit security priorities, and the vehicle through which transit agencies may justify and access other funding and resources available on a region-wide basis through the UASI program.

Funding Priority Areas

DHS/FEMA has identified several different project types and grouped them into three areas. Applicants are strongly encouraged to submit a separate IJ for each proposed project, and not to combine multiple funding priority areas/project types into a single IJ. All projects have the potential to receive the maximum Funding Priority Area Score, regardless of which Funding Priority Area the project falls under, depending on its alignment to an identified vulnerability and impact on the agency’s current security posture.

Table 2: Funding Priority Areas

Funding Priority Area	Project Description	Project Types
A	Preparedness Activities	<ul style="list-style-type: none"> • Training (basic before follow-on): <ul style="list-style-type: none"> – Security Awareness – DHS-Approved Behavior Recognition Detection Courses – Counter-Surveillance – Immediate Actions for Security Threats/Incidents • Drills and Exercises • Public Awareness • Vulnerability Assessments and Security Plans

B	Operational Deterrence/Operational Packages	<ul style="list-style-type: none"> • Canine Teams • Mobile Explosive Screening Teams • Anti-Terrorism Teams • Directed Patrols on Overtime • Sustainment of existing capabilities/programs
C	Capital Projects	<p>Anti-terrorism security enhancement measures, such as intrusion detection, visual surveillance with live monitoring, alarms tied to visual surveillance system, recognition software, tunnel ventilation and drainage system protection, flood gates and plugs, portal lighting, and similar hardening actions for:</p> <ul style="list-style-type: none"> • TTAL infrastructure remediation • Multi-User High-Density Key Infrastructure Protection • Single-User High-Density Key Infrastructure Protection • Key Operating Asset Protection • Interoperable Communications • Anti-terrorism security enhancement measures for low-density stations • Sustainment of existing capabilities/programs • Other use of funds, as outlined in Public Law 110-53 Section 1406(b)(1)

Project Sub-Components

All project types should fall under one of three common sub-component areas, regardless of Funding Priority Area:

- New Capability
- Completion or progress on an uncompleted project
- Maintenance and/or sustainment of a current project

The applicant should demonstrate in their IJ which sub-component the proposed project aligns with, how it addresses an identified vulnerability, and why the project is necessary and appropriate given the agency’s current security posture.

Operational Packages (OPacks)

Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant. Any agency having a dedicated transit security/police force of 50 or more full-time or full-time equivalent sworn officers that can attest to their ability to sustain OPacks after the grant period of performance expires may apply for OPack funding to hire new officers for K-9 teams, mobile screening teams, or anti-terrorism teams. Law enforcement agencies with dedicated transit bureaus are eligible through the public transportation agency they provide security for. The public transportation agency is the recipient and must apply on behalf of the law enforcement agency. Security service providers with unsworn law enforcement officers or guards are not eligible for OPack funding.

OPack funds apply exclusively to anti-terrorism activities and may not be used to supplant

existing agency programs already supported by the agency. Additionally, applicants must provide the number of existing teams (K-9, Mobile Explosive Screening Team (MEST), and Anti-Terrorism Teams (ATT)) already in place either with in-house funding or funded through the TSGP. OPack funds may be used to develop new or sustain existing capabilities/programs. Applicants pursuing both new OPacks and sustainment funding for existing OPacks must indicate in their IJs which is the higher priority for their agency. OPack capabilities must be funded on a full-time basis and only for their intended purposes in line with the capabilities and functions detailed in [Appendix C – Funding Guidelines](#).

Any eligible agency may apply for the equipment and support aspects of OPacks (e.g., explosives detection equipment) if they wish to provide personnel themselves (e.g., if they cannot hire additional officers, but can use existing officers). For example, an agency may purchase equipment such as portable explosive detection devices, as long as they provide personnel for a mobile screening team to operate the equipment.

Operational Activities on Overtime

Any agency with a dedicated transit security/police force may submit IJs to fund transit security police forces/law enforcement providers for patrols and activities on overtime, regardless of force size. Examples of projects include directed patrols, additional canine teams, mobile screening teams, or anti-terrorism team patrols. These activities must be dedicated to the transit environment, and must be anti-terrorism in nature. Agencies must identify the type of activity, length of operation (hours), number of personnel, and cost based on length of operation and personnel. Agencies should also provide risk-based justification for the request, to include linkage to a known event, such as hosting a significant regional sporting or political event; or a period of heightened awareness, such as a national holiday.

TSGP Program Management: Roles and Responsibilities at DHS

Effective management of the TSGP entails a collaborative effort and partnership within DHS, the dynamics of which require continuing outreach, coordination and interface. For the TSGP, FEMA operates the administrative mechanisms needed to implement and manage the grant program. TSA provides subject matter expertise on all matters relating to surface transportation security and other programmatic updates, and assists by coordinating the myriad intelligence information and risk/vulnerability assessments resulting in ranking and rating rail and mass transit assets nationwide against threats associated with potential terrorist attacks and in defining the parameters for identifying, protecting, deterring, responding to, and recovering from such incidents. Together, these two agencies with additional assistance and cooperation from the Federal Transit Administration (FTA), for rail and mass transit systems, and the Federal Railroad Administration (FRA), as needed for freight rail operations, determine the primary security architecture of the TSGP.

Appendix C – FY 2018 TSGP Funding Guidelines

TSGP grant recipients and subrecipients may only use TSGP grant funds for the purpose set forth in the grant, and all investments must be consistent with the statutory authority for the award. Grant funds may not be used for matching funds for other Federal awards, lobbying, or intervention in Federal regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal government or any other government entity.

The following pages outline general allowable and unallowable TSGP costs guidance.

Allowable Costs. Specific investments made in support of the funding priorities discussed above generally fall into one of the following six allowable expense categories:

- Planning
- Organization
- Operational Activities
- Equipment
- Training
- Exercises
- Management and Administration

The following provides guidance on allowable costs within each of these areas:

Planning

TSGP funds may be used for the following types of planning activities:

- Development and enhancement of security plans and protocols
- Development or further strengthening of security assessments, including multi-agency and multi-jurisdictional partnerships and conferences to facilitate planning activities
- Hiring of full or part-time staff and contractors or consultants to assist with planning activities only to the extent that such expenses are for the allowable activities within the scope of the grant (not for the purpose of hiring public safety personnel)
- Materials required to conduct planning activities
- Other project planning activities with prior approval from DHS/FEMA

Organization

Organizational activities include, but are not limited to:

- Program management
- Structures and mechanisms for information sharing between the public and private sector
- Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors

Operational Activities

DHS/FEMA encourages applicants to develop innovative layered approaches to enhance both human and facility security on transit systems. Helping mass transit systems increase unpredictability, and ultimate effectiveness of monitoring and patrol in their security and terrorism prevention programs is critical to National transit security. Implementation of one of the three OPack modules discussed below complements existing security systems and provides appropriate,

practical, and cost-effective means of protecting assets.

Agencies may submit IJs to fund transit security police forces/law enforcement providers for patrols and activities on overtime, such as directed patrols, additional canine teams, mobile screening teams, or anti-terrorism team patrols. These activities must be dedicated to the transit environment, and must be anti-terrorism in nature. Agencies must identify the type of activity, length of operation (hours), number of personnel, and cost based on length of operation and personnel. Agencies should also provide risk-based justification for the request, to include linkage to a known event, such as hosting a significant regional sporting or political event; or a period of heightened awareness, such as a national holiday.

Five-Year Security Capital Plan and Operational Sustainment

Applicant requests for OPacks funding must include the submission of a Five-Year Security Capital and Operational Sustainment Plan in ND Grants. This plan must include how the agency proposes to implement capital projects and demonstrate how the agency will sustain the operational investments (including officers hired with federal funding) and capabilities after grant funding has been expended. Requests for OPacks will not be funded if the applicant does not have a Security Capital and Operational Sustainment Plan.

Three OPack types have been developed to support operational activities and are available for funding for TSGP grant applicants—

- **Explosives Detection Canine Teams (EDCT).** When combined with the existing capability of a transit security/police force, the added value provided through the addition of a canine team is significant. EDCTs are a proven, reliable resource to detect explosives and are a key component in a balanced counter-sabotage program. The TSGP will provide funds to establish dedicated security/police force canine teams. Each canine team will be composed of one dog and one handler.
- **Anti-Terrorism Teams (ATT).** The ATTs capability provided through the TSGP funding is for uniformed, dedicated transit patrols on a normal operational basis, rather than using teams only for a surge capacity as provided by DHS/FEMA in the past. ATTs do not supersede other local transit security forces; rather, they augment current capabilities. Each ATT will consist of four individuals, including two overt elements (e.g., uniformed transit sector law enforcement officer, canine team, mobile explosive screeners), and two discreet observer elements.
- **Mobile Explosive Screening Team.** The Mobile Explosive Screening Team OPack will allow recipients the flexibility to deploy combinations of trained individuals and technologies that will assist in making screening decisions where there are large numbers of individuals with hand carried items. This screening technology will be coupled with mobile explosive screening technologies.

Note: Funds for canine teams may not be used to fund drug detection and apprehension technique training. Only explosives detection training for the canine teams will be funded.

Funding Availability for OPacks

OPacks have the potential to be funded for up to a 36 month period from the award date. The monetary figures presented below are stated in terms of cost per period of performance (which indicates actual/complete funding for the 36 month period). Additionally, any OPack costs

after the 36 month period of performance (including expenses related to the maintenance, personnel, equipment, etc.) are the responsibility of the applicable transit system or law enforcement subrecipient. Additional funding may be applied for in future grant cycles to maintain this operational capability, but future funding is not guaranteed and requires approval. If these positions are not sustained, the public transportation agency may not be eligible for this personnel support in the future.

Table 3: Available Funding for OPacks

Operational Package	Maximum Funding per Year (12 months)	Maximum Funding per Period of Performance (36 months)
EDCT	\$150,000 per team	\$450,000 per team
ATT	\$500,000 per team	\$1,500,000 per team
Mobile Explosive Screening Team	\$600,000 per team	\$1,800,000 per team

OPack Requirements

TSGP OPack funds may be used for new positions or to sustain existing capabilities/programs (e.g., canine teams) already supported by the recipient. Applicants pursuing both new OPacks and sustainment funding for existing OPacks must indicate in their IJs which is the higher priority for their agency. Additionally, applicants must provide the number of existing teams (K- 9, MEST, ATTs) already in place either with in-house funding or funded through the TSGP.

Table 4: OPack Requirements

Operational Package	Requirements
Explosives Detection Canine Teams	Please refer to the pages below for detailed information regarding EDCTs under the TSGP
Anti-Terrorism Teams	<p>Specific for the Canine Team within the ATT:</p> <ul style="list-style-type: none"> • Each canine team, composed of one dog and one handler, must be certified by an appropriate, qualified organization • Canines should receive an initial basic training course and also weekly maintenance training sessions thereafter to maintain the certification • The basic training averages 10 weeks for the team, with weekly training and daily exercising (comparable training and certification standards, such as those promulgated by the TSA Explosive Detection Canine Program), the National Police Canine Association (NPCA), the United States Police Canine Association (USPCA), or the International Explosive Detection Dog Association (IEDDA) may be used to meet this requirement • The individuals hired for the covert and overt elements must be properly trained law enforcement officers • Certifications should be on file with the recipient and must be made available to DHS/FEMA upon request

Mobile Explosives Screening Team	Certifications should be on file with the recipient and must be made available to DHS/FEMA upon request
----------------------------------	---

Allowable Expenses for OPacks

Table 5 identifies allowable expenses for the various OPacks. Please see the inserted notes for clarification of certain allowable costs.

Table 5: Allowable Expenses for OPacks

	Operational Package	Salary and Fringe Benefits	Training and Certification ^a	Equipment Costs	Purchase and Train a Canine	Canine Costs ^b
1.	EDCT	✓	✓	✓	✓ ^c	✓
2.	ATT	✓	✓	✓	✓	✓
3.	Mobile Explosives Screening Team	✓		✓ ^d		
^a Travel costs associated with training for personnel, handlers, and canines are allowable ^b Canine costs include but are not limited to: veterinary, housing, and feeding costs ^c Training specific to the detection of common explosives odors is allowable ^d Equipment and other costs can include but are not limited to: explosives detection; stainless steel search tables; consumables such as gloves, swabs, and alcohol; and land mobile radios						

Specific Guidance on Explosive Detection Canine Teams (EDCT)

EDCT Certification

Each Explosives Detection Canine Teams (EDCT), composed of one dog and one handler, must be certified by an appropriate, qualified organization. TSA Certified EDCTs will meet or exceed certification standards set for by the TSA National Explosives Detection Canine Team Program (NEDCTP). Recipient EDCTs that do not participate in the NEDCTP will be required to certify annually under their respective agency, local and state regulations. The recipient will maintain certification, utilization, and training data to show compliance in meeting or exceeding those guidelines set forth by the Scientific Working Group on Dog and Orthogonal Detection Guidelines (SWGDOG), formulated as of September 14, 2007, in addition to requirements set forth in the NOFO.

EDCT Submission Requirements

The recipient will ensure that a written security procedure plan exists for the safekeeping of all explosive training aids, to include safe transportation. The recipient will document the removal, use and return of explosive training aids used during training exercises or for any other reason. The plan and all documentation must be made available to DHS/FEMA upon request.

The recipient will comply with requirements for the proper storage, handling and transportation of all explosive training aids in accordance with the Bureau of Alcohol, Tobacco, Firearms and Explosives’ Publication 5400.7 (ATF P 5400.7) (09/00), *Federal Explosive Law and Regulation*.

The recipient will ensure that certified EDCTs are available to respond to situations 24 hours a day, seven days per week on an on-duty or off-duty on call basis. If TSGP-funded EDCTs are not available, other EDCTs (non-TSGP funded) may be utilized for this response. The intent is to provide maximum coverage during peak operating hours and to maintain the ability to promptly respond to threats that affect public safety or mass transit operations.

EDCTs under this grant are single purpose and will be trained to detect “live” not “simulated” explosives only. EDCTs must not have received previous training to detect any other substances.

The recipient will ensure that each EDCT receives on-site proficiency training at a minimum of four hours per week per duty cycle. This training shall include, but not be limited to: mass transit passenger cars, terminal/platform, luggage, freight/warehouse, and vehicles. Complete, detailed, and accurate training records must be maintained for all proficiency training conducted by each EDCT. These records must be made available to DHS/FEMA upon request.

The recipient will conduct appropriate training or other canine activities, within view of the public, to increase public awareness of EDCTs and provide a noticeable deterrent to acts which affect public safety or mass transit operations. The recipient will also ensure that such activities include, over a period of time, a presence in operational areas of the mass transit system during peak and off-peak hours. The recipient agrees that EDCTs will be utilized in the field at least 80 percent (80%) of their duty time, annually.

The recipient will provide safe and sanitary kennel facilities for program canines, and these costs may be allowable with prior approval by FEMA. This applies to kenneling canines at the mass transit system, handlers’ residences or commercial boarding facilities. Canines must not be left in makeshift accommodations or without proper supervision, protection and care. The recipient will ensure that canines are transported on-duty and off-duty in vehicles configured with adequate temperature control, padding and screening to ensure proper health, safety and security.

The recipient will ensure that adequate routine and emergency veterinary care are provided for all canines.

DHS/FEMA reserves the right to conduct an on-site operational and record review upon 48 hour notice to ensure compliance with applicable Federal regulations.

Equipment

TSGP funds may be used for the following categories of equipment. A comprehensive listing of allowable equipment categories and types is found in the [DHS Authorized Equipment List \(AEL\)](#). These costs include:

- Personal protection equipment
- Explosive device mitigation and remediation equipment
- Chemical, biological, radiological, nuclear, and high explosive (CBRNE) operational search and rescue equipment, logistical support equipment, reference materials, or incident response vehicles

- Interoperable communications equipment
- Components or systems needed to address flaws in the computerized systems that control generators, switching stations, and electrical substations as well as other emerging threats to infrastructure critical to the U.S. economy
- Detection Equipment
- Power equipment
- Terrorism incident prevention equipment
- Physical security enhancement equipment

Unless otherwise noted, equipment must be certified as meeting required regulatory and DHS-adopted standards to be eligible for purchase using these funds. Equipment must comply with the *Occupational Safety and Health Act* (OSHA) requirement for certification of electrical equipment by a nationally recognized testing laboratory, and demonstrate compliance with relevant DHS-adopted standards through a supplier's declaration of conformity with appropriate supporting data and documentation per International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17050, Parts One and Two. In addition, agencies must have all necessary certifications and licenses for the requested equipment, as appropriate, prior to the request. DHS adopted standards are found at <http://www.dhs.gov/dhs-implementation-statement-regarding-standard-terms-and-conditions-research-grants>.

In addition, recipients (including subrecipients) that are using TSGP funds to support emergency communications equipment activities must comply with the *SAFECOM Guidance for Emergency Communication Grants*, including provisions on technical standards that ensure and enhance interoperable communications. *SAFECOM Guidance* can be found at <https://www.dhs.gov/safecom>.

Requirements for Small Unmanned Aircraft System

All requests to purchase Small Unmanned Aircraft System (SUAS) with FEMA grant funding must comply with [IB 426](#) and must include a description of the policies and procedures in place to safeguard individuals' privacy, civil rights, and civil liberties of the jurisdiction that will purchase, take title to, or otherwise use the SUAS equipment.

Maintenance and Sustainment

The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable, as described in FEMA Policy FP 205-402-125-1 (Additional guidance is provided in FEMA Policy FP 205-402-125-1, Maintenance Contracts and Warranty Coverage Funded by Preparedness Grants, located at: <http://www.fema.gov/media-library/assets/documents/32474>), under all active and future grant awards, unless otherwise noted.

Grant funds are intended to support the National Preparedness Goal and fund projects that build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order to provide recipients the ability to meet this objective, the policy set forth in GPD's [IB 379: Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for the expansion of eligible maintenance and sustainment costs which must be in (1) direct support of existing capabilities; (2) must be an

otherwise allowable expenditure under the applicable grant program, and (3) be tied to one of the core capabilities in the five mission areas outlined in the Goal. Additionally, eligible costs may also be in support of equipment, training, and critical resources that have previously been purchased with either Federal grant or any other source of funding other than DHS/FEMA preparedness grant program dollars.

Construction Projects Guidance

Recipients must obtain written approval from FEMA prior to the use of any TSGP funds for construction or renovation projects. When applying for construction funds, including communications towers, at the time of application, recipients must submit evidence of approved zoning ordinances, architectural plans, any other locally required planning permits, and a notice of Federal interest. Additionally, recipients are required to submit a SF-424C Form and budget detail citing the project costs.

Recipients and subrecipients are also encouraged to have completed as many steps as possible for a successful EHP review in support of their proposal for funding (e.g., 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).

Projects for which the recipient believes an Environmental Assessment (EA) may be needed, as defined in [DHS Instruction Manual 023-01-001-01, Revision 01](#), [FEMA Directive 108-1](#) and [FEMA Instruction 108-1-1](#), instances must also be identified to the FEMA HQ Program Analyst within six months of the award. Completed EHP review materials for construction and communication tower projects must be submitted no later than 12 months before the end of the period of performance. EHP review materials should be sent to gpdehpinfo@fema.gov.

TSGP recipients using funds for construction projects must comply with the *Davis-Bacon Act* (40 U.S.C. §§ 3141 *et seq.*). Grant recipients must ensure that their contractors or sub-contractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the state in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor (DOL) wage determinations, is available from the following website at <https://www.dol.gov/whd/govcontracts/dbra.htm>.

Training

TSGP funds may be used for the following training activities:

- **Training Workshops.** Grant funds may be used to plan and conduct training workshops to include costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel, and training plan development. Recipients are strongly encouraged to use free public space/locations/facilities, whenever available, prior to the rental of space/locations/facilities. Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any training or training gaps, including those for children and individuals with disabilities or access and functional needs, should be identified in an After Action Report/Improvement Plan (AAR/IP) and addressed in the training cycle.
- **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff

or contractors/consultants may be hired to support training-related activities. Reimbursement of these costs should conform with the policies of the state or local unit(s) of government or the awarding agency, whichever is applicable. Recipients should reference [Section H](#) of this NOFO for further information. Such costs must be included within the funding allowed for program management personnel expenses, which must not exceed 10 percent (10%) of the total allocation. Dual compensation is unallowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government and from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant.

- **Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related to backfilling personnel, which are the direct result of attendance at FEMA and approved training courses and programs are allowable. Reimbursement of these costs should follow the policies of the state or local unit(s) of government or the awarding agency, whichever is applicable. In no case is dual compensation allowable.
- **Travel.** Domestic travel costs (e.g., airfare, mileage, per diem, and hotel) are allowable as expenses by employees who are on travel status for official business related, approved training.
- **Supplies.** Supplies, items that are expended or consumed during the course of the planning and conduct of the training project(s) (e.g., gloves and non-sterile masks), are allowable expenses.
- **Funds Used to Develop, Deliver, and Evaluate Training,** including costs related to administering the training, planning, scheduling, facilities, materials and supplies, reproduction of materials, and equipment are allowable expenses. Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any training or training gaps, including those for children and individuals with disabilities or access and functional needs, should be identified in the AAR/IP and addressed in the training cycle.

Recipients are encouraged to use existing training rather than developing new courses. When developing new courses, recipients are encouraged to apply the Analysis Design Development and Implementation Evaluation (ADDIE) model of instruction design.

Information on DHS/FEMA-approved training can found at the following website <http://www.firstrespondertraining.gov/>.

Exercises

TSGP funds may be used for the following exercise activities:

- **Funds Used to Design, Develop, Conduct and Evaluate an Exercise.** This includes costs related to planning, meeting space, and other meeting costs, facilitation costs, materials and supplies, travel, and documentation. Exercises afford organizations the opportunity to validate plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets in a controlled, low-risk setting. Any shortcoming or gap identified, including those for children and individuals with disabilities or access and functional needs, should be identified in an effective corrective action program that includes development of improvement plans that are dynamic documents, with corrective

actions continually monitored and implemented as part of improving preparedness through the exercise cycle.

- **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff may be hired to support exercise-related activities. Such costs must be included within the funding allowed for program management personnel expenses, which must not exceed 10 percent (10%) of the total allocation. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government and from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant.
- **Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related to backfilling personnel, which are the direct result of time spent on the design, development and conduct of exercises are allowable expenses. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the state or unit(s) of local government and has the approval of the state or the awarding agency, whichever is applicable. In no case is dual compensation allowable.
- **Travel.** Domestic travel costs are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of exercise project(s).
- **Supplies.** Supplies are items that are expended or consumed during the course of the planning and conduct of the exercise project(s) (e.g., gloves, non-sterile masks, and disposable protective equipment).
- **Other Items.** These costs include the rental of space/locations for exercise planning and executing, rental of equipment, etc. Recipients are encouraged to use free public space/locations/facilities, whenever available, prior to the rental of space/locations/facilities. These also include costs that may be associated with inclusive practices and the provision of reasonable accommodations and modifications to provide full access for children and adults with disabilities.

Management and Administration (M&A)

Management and administration costs are allowed under this program. M&A costs are activities directly related to managing and administering the award. Recipients may use up to 5 percent (5%) of the amount of the award for their M&A and subrecipients may use up to 5 percent (5%) for M&A of the amount they receive.

FY 2018 TSGP funds may be used for the following M&A costs:

- Hiring of full-time or part-time staff (see [Section H](#) for further information), including contractors and consultants, to execute the following:
 - Management of the FY 2018 TSGP Award
 - Design and implementation of the FY 2018 TSGP submission meeting compliance with reporting/data collection requirements, including data calls
- Information collection and processing necessary to respond to DHS/FEMA data calls
- Travel expenses related to TSGP grant administration
- Acquisition of authorized office equipment, including personal computers or laptops for TSGP M&A purposes

Improving Cybersecurity Capabilities

When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity](#) (“The Framework”) developed by the National Institute of Standards and Technology (NIST). The Framework gathers existing international standards and practices to help organizations understand, communicate, and manage their cyber risks. For organizations that do not know where to start with developing a cybersecurity program, the Framework provides initial guidance. For organizations with more advanced practices, the Framework offers a way to improve their programs, such as better communication with their leadership and suppliers about management of cyber risks.

The Department of Homeland Security's Critical Infrastructure Cyber Community C³ Voluntary Program also provides resources to critical infrastructure owners and operators to assist in adoption of the Framework and managing cyber risks. Additional information on the Critical Infrastructure Cyber Community C³ Voluntary Program can be found at www.dhs.gov/ccubedvp.

The Department of Homeland Security’s Enhanced Cybersecurity Services (ECS) program is an example of a resource that assists in protecting U.S.-based public and private entities and combines key elements of capabilities under the “Detect” and “Protect” functions to deliver an impactful solution relative to the outcomes of the Cybersecurity Framework. Specifically, ECS offers intrusion prevention and analysis services that help U.S.-based companies and state, local, tribal, and territorial governments defend their computer systems against unauthorized access, exploitation, and data exfiltration. ECS works by sourcing timely, actionable cyber threat indicators from sensitive and classified Government Furnished Information (GFI). DHS then shares those indicators with accredited Commercial Service Providers (CSPs). Those CSPs in turn use the indicators to block certain types of malicious traffic from entering a company’s networks. Groups interested in subscribing to ECS must contract directly with a CSP in order to receive services. Please visit <http://www.dhs.gov/enhanced-cybersecurity-services> for a current list of ECS CSP points of contact.

Indirect Costs

Indirect costs are allowable under this program 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) must be provided to FEMA before indirect costs are charged to the award.

Unallowable Costs

Specific unallowable costs include:

- **Unallowable Equipment:** Grant funds must comply with [IB 426](#) and may not be used for the purchase of the following equipment: firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed. Expenditures for items such as general-use software, general-use computers and related equipment (other than for allowable M&A activities, or otherwise associated preparedness or response functions), general-use vehicles, licensing fees, weapons systems, and ammunition.

- Personnel costs (except as detailed above).
- Activities unrelated to the completion and implementation of the TSGP.
- Other items not in accordance with the AEL or not previously listed as allowable costs.

Appendix D – FY 2018 TSGP Evaluation Plan, Scoring Criteria, and Score Sheet

I. Overview

The FY 2018 TSGP provides \$88,000,000 to public intracity bus and rail transit systems exclusively through a competitive program without tiers or target allocations. As part of the FY 2018 TSGP, DHS will use a risk based approach to apply resources to strengthen the security of the Nation’s transit systems. This appendix provides an overview of the process, and evaluation methods that will be undertaken for FY 2018 TSGP.

The FY 2018 TSGP grants will be awarded using a competitive approach based on risk. Eligible transit systems are determined using a risk-based formula, with particular emphasis placed on:

- Passenger volume (ridership) and underwater and underground infrastructure of the rail transit systems, and
- Ridership, passenger miles, and the number of buses for intracity bus systems.

II. High-level process and timeline overview

Applicants should submit the SF-424 via [Grants.gov](https://www.grants.gov) by **June 13, 2018**. The SF-424 will be transferred to FEMA’s ND Grants system. FEMA will determine whether an application should proceed further and the applicant will be notified to complete their submission by fulfilling additional application requirements (e.g., IJ, detailed budget) **no later than June 20, 2018**, to formally request FY 2018 TSGP funds.

Each applicant may submit up to eight IJs per transit agency and up to five IJs for law enforcement entities who are contracted to provide security and law enforcement services to an eligible agency. Law enforcement providers may only submit projects that support the transit system’s operational security capability and capacity.

All IJs must be submitted by **5:00 pm ET on June 20, 2018**, to be considered for funding. The IJs will first be screened for eligibility and then reviewed by subject matter experts on a National Review Panel (NRP). The NRP will evaluate and score each IJ based on the evaluation criteria outlined in the FY 2018 TSGP NOFO and described in this appendix. The NRP will develop funding recommendations and project approvals that will be forwarded to an Executive Committee. The Executive Committee will recommend funding decisions and projects that are presented to the Secretary of Homeland Security. Ultimately, TSGP authorizing statutes place final funding determinations at the discretion of the Secretary of Homeland Security. DHS/FEMA anticipates that awards will be announced on or around **August 27, 2018**.

III. Sequence of Events

The following sequence of events will be followed when evaluating proposed transit system investment justifications. More detail on each step is found below in this appendix.

1. FEMA’s Grant Programs Directorate (GPD) will receive and conduct an initial review of all FY 2018 TSGP applications to verify that they are complete and contain all of the required application materials and meet the eligibility requirements

described in this NOFO. Incomplete applications will not be considered for funding. Applications that meet the requirements outlined in the application kit and meet the eligibility requirements will be evaluated by the NRP.

2. GPD will conduct panel preparations for the NRP.
3. The NRP, which consists of subject matter experts from various federal agencies, will review and score the eligible applications against the applicable evaluation criteria.
4. The NRP will create a rank order listing of proposed projects based on NRP scoring and will provide a recommended slate of projects for funding, associated funding amounts, and review comments as the basis for decisions.
5. An Executive Committee will review the NRP recommendations, which include the transit system risk scores and funding priority area group for each IJ. The Executive Committee will make final project award recommendations based on both the investment justification scores and risk scores, and brief those decisions to DHS/FEMA senior leadership. Ultimately, TSGP authorizing statutes place final funding determinations at the discretion of the Secretary of Homeland Security.
6. The final approved projects and funding will be sent to GPD for final award processing.

IV. Pre-National Review Panel Process

The Pre-NRP process consists of the initial application submission processing and download, eligibility checks, and the necessary panel preparations scheduled before formal NRP meetings hosted by FEMA.

Application Submissions

SF-424s must be submitted via www.grants.gov by June 13, 2018. All other application materials, including IJs and budgets, must be submitted via ND Grants by 5:00 p.m. ET on June 20, 2018.

Eligibility Screen

Once the applications are received by ND Grants, they will be screened by FEMA GPD for eligibility and basic minimum requirements.

Applications that meet administrative and eligibility requirements outlined in this NOFO will be assigned to, and evaluated by, the NRP. All eligibility screens will be completed prior to the NRP convening.

V. Evaluation Criteria

In an effort to promote transparency and focus on effective risk-mitigating projects, a scoring methodology has been adopted that promotes the consistent and accurate evaluation of projects. The criteria that will be used in funding decisions are described in detail below.

For all TSGP applications, a total score will be calculated to aid with funding selections. The total score will consist of four individual parts: an agency risk group score; a score associated with the investment's alignment to the funding priority areas; a risk mitigation score based on the NRP's review of the IJ; and the degree of regional collaboration.

Risk Group Score

Each agency will be assigned a risk group score based on the agency's individual risk score along with a regional risk component. Risk group scores range from one to ten, where ten represents the highest risk group. The score is calculated using a risk process developed and maintained by DHS/FEMA and DHS/TSA.

Risk Mitigation Score

Risk Mitigation will be evaluated and scored by the NRP based on the following criteria:

1. **Cost effectiveness.** The investment justification should provide evidence of the security impact, as well as justification for the strategic use of the proposed budget. The project cost levels should be commensurate with the security impact, and the proposed solution should be reasonable and advantageous over other possible solutions.

Effectiveness in remediating TTAL assets will be incorporated into the cost effectiveness score. The IJ should show how the project has the capability to fully remediate the vulnerabilities of assets on the TTAL. Highly-scored projects will exhibit returns in which the benefits, expected impacts on security, will be great relative to the financial investment.

2. **Ability** to reduce risk of catastrophic events.
3. **Sustainability** without additional Federal funds and leveraging of other funding, including exhibiting a likelihood of success, or continued success, without requiring additional Federal assistance.
4. **Timelines** with regard to the ability to complete the proposed project within submitted timeframes specified in the grant guidance. The IJ should provide a timeline and schedule, and demonstrate evidence of ability to complete it within submitted timeline based on proposed strategy, potential implementation challenges, resource plan, and workability of the proposed schedule.

Funding Priority Areas Score

Funding Priority Areas (*in no particular order*):

- Preparedness Activities
- Operational Deterrence
- Capital Projects

Each of these priorities has three common sub-categories (*in no particular order*):

- Maintenance and Sustainment

- New Projects/Capability
- Completion of phased/partial project

For capital projects only, all else being equal, priority consideration will be given in the following order:

1. TTAL Infrastructure
2. Multi-User High-Density Key Infrastructure
 - Tunnel Hardening
 - High-Density Elevated Operations
 - Multi-User High-Density Stations
 - Hardening of Supervisory Control and Data Acquisition (SCADA) Systems, other industrial control systems, or other programs that enhance cybersecurity
 - Sustainment/maintenance
3. Single-User High-Density Key Infrastructure
 - Anti-terrorism security enhancement measures for high-density stations and bridges
 - Sustainment/maintenance
4. Key Operating Asset Protection
 - Physical hardening/security of control centers
 - Secure stored/parked trains, engines, and buses (bus/rail yards)
 - Maintenance facilities
 - Bus/train hardening
 - Sustainment/maintenance
5. Other Mitigation Activities
 - Interoperable communications
 - Anti-terrorism security enhancement measures for low-density stations
 - Sustainment/maintenance
 - Other uses of funds, as outlined in Public Law 110-53 Section 1406(b)(1)

The NRP will review each IJ to determine how well the proposed project aligns with the Funding Priority Areas, and assign a score from 0-7 using the below “checklist” questions:

- Is the project clearly focused on security (vs. safety or operational in nature)?
- Will the project measurably buy-down risk based on linkage to the TVA and the agency’s current security posture?
- Does the project fit into the agency’s current security posture? (*e.g., if an agency has a mature security program, then a response/recovery investment makes sense vs. if the agency is in the beginning stages of their security program development*)
- Given the current threat environment, will the project address a national/regional/local security issue?

The NRP will use the below table as a guide when determining an IJ’s Funding Priority Area score:

IJ Meets This # of Checklist Questions	Potential Score
5	7
4	5-6
3	3-4
2	2
1	1
0	0

Regional Collaboration Component

Regional Collaboration is determined in regard to the ability to leverage the impact of the investment by including other regional partners over and above expected/necessary collaboration. The investment justification should provide details as to the extent to which regional security partners (other transit agencies, local law enforcement, emergency responders, etc.) are included and coordinated with for the successful implementation of a project, as appropriate. Applications will receive between 0 and 1.5 points for regional collaboration.

Final project scores will be calculated as follows:

Risk Group Score + Risk Mitigation Score + Funding Priority Areas Score + Regional Collaboration Component

VI. National Review Process

National Review Panel Composition

Each application that meets the minimum requirements for application submission in accordance with the FY 2018 TSGP NOFO will be evaluated by the NRP. FEMA will invite partner agencies to participate in the TSGP review process.

Evaluation Process

There will be a single NRP assigned to score and evaluate the entirety of TSGP IJs and produce a rank order listing of proposed projects with associated comments. As there will only be one panel, normalizing of scores will not be necessary. The NRP will convene daily until the application reviews are complete.

The key output from the NRP will be a list of recommended projects for the Executive Committee to review. The recommended project list will be presented by the order in which they scored, with the highest scoring project being at the top. As highest scoring projects are recommended for funding by the NRP, the remaining balance will be exhausted based on the size of requested funding and the available funding. In some circumstances, with limited remaining funding, some smaller projects with lower scores could potentially be recommended instead of higher scoring projects that are more expensive. In situations where multiple projects receive equal scores that straddle the available funding threshold, the Risk Group

score will serve as a tie-breaker. If a tie still exists, where multiple projects receive equal scores that straddle the available funding threshold, the Executive Committee will make the final recommendation.

Executive Committee and Final Award Determination

The Executive Committee, made up of senior leadership from FEMA and TSA, will review the NRP's scoring summary and funding recommendations.

FEMA and TSA will brief the final results of the Executive Committee's review, approved projects and funding to senior DHS/FEMA leadership. Ultimately, TSGP authorizing statutes place final funding determinations at the discretion of the Secretary of Homeland Security.

TSGP IJ RATING / SCORE SHEET

SECTION A: FY 2018 TSGP Applicant Information	
Application Number: _____	Agency Name: _____
Investment Justification Number: _____	Investment Justification Title: _____
SECTION B: FY 2018 Priority Group Score Checklist	
1) Is the project clearly focused on security (vs. safety or operational in nature)?	_____
2) Is the project clearly linked to one or more vulnerabilities in a recent TVA?	_____
3) Will the project measurably buy-down risk based on linkage to the TVA and the agency's current security posture?	_____
4) Does the project fit into the agency's current security posture? (e.g., if an agency has a mature security program, then a response/recovery investment makes sense vs. if the agency is in a beginning stage of their security program development)	_____
5) Given the current threat environment, will the project address a national/regional/local security issue	_____
Number of Checks	_____
Score	_____

SECTION C:
FY 2018 TSGP RISK MITIGATION RATING

**Allowable Point
Range
Rating/Score**

Rating Criteria

1: *The extent to which the Investment Justification demonstrates **cost effectiveness** with regard to the impact on security relative to the investment.* The Investment Justification should provide evidence of the expected security impact, as well as justification for the strategic usage of the proposed budget. The project cost levels should be commensurate with the security impact, and the proposed solution should be reasonable and advantageous over other possible solutions.

0-12

Cost Effectiveness Rating Key

0	1-4	5-8	9-12
Investment justification does not provide evidence to determine cost effectiveness	Investment justification demonstrates minimal cost effectiveness	Investment justification demonstrates moderate cost effectiveness	Investment justification demonstrates strong cost effectiveness

2: *The extent to which the Investment Justification exhibits the likelihood of **increasing security effectively** by the ability to reduce risk of catastrophic events and closing identified gaps in vulnerability assessments and/or security plans.* The investment justification should show a high likelihood of improved security by reducing risk when implemented as designed.

0-12

Feasibility Rating Key

0	1-4	5-8	9-12
Investment justification offers no potential for improved security	Investment justification offers limited potential for improved security	Investment justification offers moderate potential for improved security	Investment justification offers high potential for improved security

3: *The extent to which the Investment Justification exhibits the potential for **sustainability without additional federal funds and leveraging of other funding**, including exhibiting a likelihood of success, or continued success, without requiring additional federal assistance.* The Investment Justification should show potential or confirmed additional funding in the form of a cash or in-kind match. It should also show a high likelihood of success or continued success without additional federal assistance, as well as offer a long-term sustainability plan.

0 or 2

Sustainability Rating Key

0	2
Investment justification offers no potential for long-term sustainability	Investment justification offers high potential for long-term sustainability

<p>4: The extent to which the Investment Justification demonstrates <i>the ability to complete the proposed project within submitted timeframes</i> specified in grant guidance. The Investment Justification should provide a timeline and schedule, and demonstrate evidence of ability to complete it within submitted timeline based on proposed strategy, identified implementation challenges, management and resource plan, and reasonableness of anticipated schedule.</p> <p><u>Timely Completion Rating Key</u></p> <table border="1" data-bbox="321 445 1036 646"> <tr> <td data-bbox="321 445 678 487">0</td> <td data-bbox="678 445 1036 487">2</td> </tr> <tr> <td data-bbox="321 487 678 646">Investment justification exhibits no evidence of an ability to complete the project within the submitted timelines</td> <td data-bbox="678 487 1036 646">Investment justification exhibits strong evidence of an ability to complete the project within the submitted timeline</td> </tr> </table>	0	2	Investment justification exhibits no evidence of an ability to complete the project within the submitted timelines	Investment justification exhibits strong evidence of an ability to complete the project within the submitted timeline	<p>0 or 2</p>				
0	2								
Investment justification exhibits no evidence of an ability to complete the project within the submitted timelines	Investment justification exhibits strong evidence of an ability to complete the project within the submitted timeline								
<p>TOTAL INVESTMENT JUSTIFICATION RISK MITIGATION SCORE:</p>									
<p>Additional Factors</p>	<p>Allowable Point Range Rating/Score</p>								
<p>1: The extent to which the Investment Justification demonstrates <i>the ability to leverage the impact by including other regional partners over and above the expected/necessary collaboration</i>. The IJ should provide details of the expected regional collaboration. The IJ should provide details as to the extent to which regional security partners are included and coordinated with for the successful implementation of a project, as appropriate. This regional collaboration can be demonstrated with other eligible transit agencies in the region, other non-eligible transit agencies, and/or local first responders, such as law enforcement entities, fire departments, EMT, etc. Note: If the project is exercises or drills, then it should include other regional partners such as other transit systems or emergency responders, etc.</p> <p><u>Regional Collaboration Rating Key</u></p> <table border="1" data-bbox="133 1348 1117 1579"> <tr> <td data-bbox="133 1348 397 1390">0</td> <td data-bbox="397 1348 636 1390">.5</td> <td data-bbox="636 1348 875 1390">1.0</td> <td data-bbox="875 1348 1117 1390">1.5</td> </tr> <tr> <td data-bbox="133 1390 397 1579">Investment justification exhibits no level of collaboration</td> <td data-bbox="397 1390 636 1579">Investment justification exhibits nominal level of collaboration</td> <td data-bbox="636 1390 875 1579">Investment justification exhibits moderate level of collaboration</td> <td data-bbox="875 1390 1117 1579">Investment justification exhibits significant level of regional collaboration</td> </tr> </table>	0	.5	1.0	1.5	Investment justification exhibits no level of collaboration	Investment justification exhibits nominal level of collaboration	Investment justification exhibits moderate level of collaboration	Investment justification exhibits significant level of regional collaboration	<p>0-1.5</p>
0	.5	1.0	1.5						
Investment justification exhibits no level of collaboration	Investment justification exhibits nominal level of collaboration	Investment justification exhibits moderate level of collaboration	Investment justification exhibits significant level of regional collaboration						

SECTION D: Comments

(Summarize the merit of the investment justification and provide a justification for the final rating and recommended funding level.) **If the reviewer has a conflict of interest associated with an investment justification response, he/she should state and describe the point of conflict and leave the rest of the evaluation blank.**

Basis for Funding at Reduced Level (if applicable):

Appendix E – FY 2018 TSGP Investment Justification Template

As part of the TSGP application process, applicants must develop a formal IJ that addresses each initiative being proposed for funding, including M&A costs. An agency may submit up to eight IJs per region. Agencies may also submit up to five additional IJs for projects related to law enforcement providers that are not part of the organization. Law enforcement providers may only submit projects that support the transit system’s operational security capability and capacity. Each IJ must demonstrate how a proposed project addresses gaps and deficiencies in current programs and capabilities. The IJ must demonstrate the ability to provide enhancements consistent with the purpose of the program and guidance provided by DHS/FEMA. Applicants must ensure that the IJ is consistent with all applicable requirements outlined in this application kit.

Investment Heading	
Date	
Applicant	
Region and Urban Area(s) Impacted	
Investment Name	
Investment Amount	\$

I. Background

Note: This section only needs to be completed once per application, regardless of the number of investments proposed. The information in this section provides background/context for the investment(s) requested, but does not represent the evaluation criteria used by DHS/FEMA for rating individual investment proposals.

I.A. Identify the point(s) of contact for this investment.	
Response Type	Narrative
Response Instructions	Identify the following: <ul style="list-style-type: none"> • Point of contact’s (POC) name and title; • POC’s full mailing address; • POC’s telephone number; • POC’s fax number; • POC’s email address; and • Also include the corresponding information for the single authorizing official for the applicant organization—i.e., the individual authorized to sign a grant award.
Response:	

I.B. Describe the operating system.	
Response Type	Narrative
Response Instructions	Describe the following: <ul style="list-style-type: none"> • Infrastructure; • Ridership data; • Number of passenger miles; • Number of vehicles and/or vessels; • System map; and • Other sources of funding being leveraged for security enhancements.
Response	

II. Strategic and Program Priorities

II.A. Provide an abstract for this investment.	
Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"> • Describe what the project is, how it will be executed, and its purpose. • Define the vision, goals, and objectives for the risk reduction, and summarizes how the proposed investment will fit into the overall effort to meet the critical infrastructure security priorities (including integration into existing security protocols); • Describe the specific needs and/or resource limitations that need to be addressed; • Identify any potential partners and their roles and staffing requirements, and provide information on any existing agreements such as Memoranda of Understanding (MOU); • Identify specific equipment needs (e.g., number of facility cameras, number of security lights, amount of security fencing, etc.) and other details for training, awareness, exercises, and other programs, if applicable (e.g., number of people to be trained, length of training, type of training, number of printed materials, number of agencies and staff members involved in exercise planning, execution, and review); • Describe progress made on the security project this investment will be completing, if applicable; and • Reference use of prior year grant funds, if applicable. <p><i>Note: Ensure that details on purchases within this section match what is outlined in the detailed budget.</i></p>
Response	

II.B. Describe how this investment specifically addresses one or more of the funding priorities identified in the current year grant NOFO.	
Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"> • Describe how the investment addresses one or more Funding Priority Areas outlined in this NOFO.
Response	

III. Impact

III.A. Discuss how the implementation of this investment will decrease or mitigate risk. Describe how the project offers the highest risk reduction potential at the least cost. Include output and outcome metrics	
Response Type	Narrative

Response Instructions	<ul style="list-style-type: none"> • Discuss how this investment will reduce risk (e.g., reduce vulnerabilities or mitigate the consequences of an event) in a cost effective manner by addressing the needs and priorities identified in earlier analysis and review; • Identify the nature of the risk and how the risk and need are related to show how addressing the need through this investment will also mitigate risk (e.g., reduce vulnerabilities or mitigate the consequences of an event); • Outline the expected, high-level impacts this investment is expected to attain or achieve if implemented, and potential negative impacts if the investment is not implemented. • Explain how this investment supports the building or sustaining of the National Preparedness Goal core capabilities
Response	

IV. Funding & Implementation Plan

IV.A. Investment Funding Plan.	
Response Type	Numeric and Narrative
Response Instructions	<ul style="list-style-type: none"> • Complete the chart below to identify the amount of funding the recipient is requesting for this investment only; • Funds should be requested and detailed by allowable cost categories (i.e., planning, organization, equipment, training, exercises, and management and administration); • Applicants must make funding requests that are reasonable and justified by direct linkages to activities outlined in this particular investment; and • Applicants must indicate whether additional funding (non-Federal grants) will be leveraged for this investment. <p><i>Note: Investments will be evaluated on the expected impact on security relative to the amount of the investment (i.e., cost effectiveness). An itemized Budget Detail Worksheet and Budget Narrative must also be completed for this investment.</i></p>
Response	

The following template illustrates how recipients should indicate the amount of TSGP funding required for the investment, how these funds will be allocated across the cost elements, and what (if any) non-TSGP funds will be utilized:

	Federal Request Total	Other Funding Sources Applied	Grand Total
<i>Planning</i>			
<i>Equipment</i>			
<i>Training</i>			
<i>Exercises</i>			
<i>Operational Packages</i>			
<i>M&A</i>			
<i>Grant Writer Fee (up to \$1,500)</i>			
Total			

IV.B. Discuss funding resources beyond the current fiscal year grant funding that have been identified and will be leveraged to support the implementation and sustainment of this investment.

Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"> • Give the expected total life-span for this investment if fully implemented and sustained through completion; • Discuss other funding sources (e.g., non-Federal grant programs, public or private agreements, future fiscal year grants) that the applicant plans on utilizing for the implementation and/or continued sustainment of this investment; • If no other funding resources have been identified, or if none are necessary, provide rationale as to why the requested TSGP funding is sufficient for the implementation and sustainment of this investment; and • Investments will be evaluated on the extent to which they exhibit a likelihood of success, or continued success, without requiring additional Federal assistance.
Response	

IV.C. Provide a high-level timeline, milestones and dates, for the implementation of this investment. Up to 10 milestones may be provided.

Response Type	Narrative
Response Instructions	<ul style="list-style-type: none"> • Only include major milestones that are critical to the success of the investment; • While up to 10 milestones may be provided, The recipient should only list as many milestones as necessary; • Milestones are for this discrete investment – those that are covered by the requested TSGP funds and will be completed over the grant period; • Milestones should be kept to high-level, major tasks that will need to occur; • Identify the planned start date associated with the identified milestone. The start date should reflect the date at which the earliest action will be taken to start achieving the milestone; • Identify the planned completion date when all actions related to the milestone will be completed and overall milestone outcome is met; and • List any relevant information that will be critical to the successful completion of the milestone (such as those examples listed in the question text above).
Response	

Note: After completing the template for each investment, the recipient should review the information provided to ensure accuracy, particularly in the Milestone Dates and the Investment Funding Plan.

Investment Justification Submission and File Naming Convention

Investment Justifications must be submitted with the grant application as a file attachment within <https://portal.fema.gov>. Applicants must use the following file naming convention when submitting the IJs as part of the TSGP:

Region_Agency_IJ Number (Example: Chicago_CTA_IJ_1)

Appendix F – FY 2018 TSGP Sample Budget Detail Worksheet

Sample Budget Detail Worksheet

Purpose: The Budget Detail Worksheet may be used as a guide to assist applicants in the preparation of the budget and budget narrative. Applicants may submit the budget and budget narrative using this form or in the format of their choice (plain sheets, the applicant’s own form, or a variation of this form). However, all required information (including the budget narrative) must be provided. Any category of expense not applicable to the applicant’s budget may be deleted. Below is an example for reference purposes.

A. Personnel. List each position by title and name of employee, if available. Show the annual salary rate and the percentage of time to be devoted to the project. Compensation paid for employees engaged in grant activities must be consistent with that paid for similar work within the applicant organization.

Name/Position	Computation	Cost
John Doe, Widget Producer	\$30,000 annually x 50% effort	\$ 15,000
Total Personnel		\$ 15,000

B. Fringe Benefits. Fringe benefits should be based on actual known costs or an established formula. Fringe benefits are for the personnel listed in budget category (A) and only for the percentage of time devoted to the project.

Name/Position	Computation	Cost
John Doe, Widget Producer	15,000 x 50% of salary	\$ 7,500
Total Fringe Benefits		\$ 7,500

C. Travel. Itemize travel expenses of project personnel by purpose (e.g., staff to training, field interviews, advisory group meeting, etc.). Show the basis of computation (e.g., six people to three-day training at \$X airfare, \$X lodging, \$X subsistence). In training projects, travel and meals for trainees should be listed separately. Show the number of trainees and unit costs involved. Identify the location of travel, if known. Indicate source of travel policies applied, applicant or Federal travel regulations.

Purpose of Travel	Location	Item	Computation	Cost
FLETC Training	Washington, DC	Hotel	150 x 3 nights	\$ 450
Total Travel				\$ 450

D. Equipment. List non-expendable items that are to be purchased. Non-expendable equipment is tangible property having a useful life of more than one year. (Note: Organization’s own capitalization policy and threshold amount for classification of equipment may be used). Identify the Authorized Equipment List number (AEL #) for items requested. Expendable items should be included either in the “Supplies” category or in the “Other” category. Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high cost items and those subject to rapid technical advances. Rented or leased equipment costs should be listed in the “Contractual” category. Explain how the equipment is necessary for the success of the project. Attach a narrative describing the procurement method to be used.

Budget Narrative: A narrative budget justification must be provided for each of the budget items identified.

Item	Computation	Cost
Harness	10 x \$100	\$ 1,000
Total Equipment		\$ 1,000

E. Supplies. List items by type (office supplies, postage, training materials, copying paper, and other expendable items such as books, hand held tape recorders) and show the basis for computation. (Note: Organization’s own capitalization policy and threshold amount for classification of supplies may be used). Generally, supplies include any materials that are expendable or consumed during the course of the project.

Supply Items	Computation	Cost
Paper	10 reams x \$30	\$ 300
Total Supplies		\$ 300

F. Consultants/Contracts. Indicate whether the applicant’s procurement policy follows the applicable standards at 2 C.F.R. §§ 200.317-200.326.

Consultant Fees: For each consultant enter the name, if known, service to be provided, reasonable daily or hourly (8-hour day), and estimated time on the project to include M&A. Include any pre-award grant writing services provided by a consultant in this section (maximum cost is \$1,500 per applicant).

Budget Narrative: A narrative budget justification must be provided for each of the budget items identified.

Name of Consultant	Service Provided	Computation	Cost
John Doe Consultant	Training Consultant	\$100/hr. x 100 hours	\$ 10,000
Subtotal – Consultant Fees			\$ 10,000

Consultant Expenses: List all reasonable expenses to be paid from the grant to the individual consultant in addition to their fees (i.e., travel, meals, lodging, etc.).

Budget Narrative: A narrative budget justification must be provided for each of the budget items identified.

Item	Location	Computation	Cost
John Doe Consultant	Phoenix, AZ	Hotel 150 x 3nights	\$ 450
Subtotal – Consultant Expenses			\$ 450

Contracts: Provide a description of the product or services to be procured by contract and an estimate of the cost. Applicants are encouraged to promote free and open competition in awarding contracts. Any sole source contracts must follow the requirements set forth in applicable state and local laws and regulations, as well as applicable Federal regulations at 2 C.F.R. Part 200.

Budget Narrative: A narrative budget justification must be provided for each of the budget items identified.

Item	Cost
Jane Doe Contractor – Engine Maintenance, 36 months	\$ 30,000
Subtotal – Contracts	\$
Total Consultants/Contracts	\$

G. Other Costs. List items (e.g., reproduction, janitorial or security services, and investigative or confidential funds) by major type and the basis of the computation. For example, provide the square footage and the cost per square foot for rent, and provide a monthly rental cost and how many months to rent.

Budget Narrative: Provide a narrative budget justification for each of the budget items identified.

Important Note: If applicable to the project, construction costs should be included in this section of the Budget Detail Worksheet.

Description	Computation	Cost
		\$
	Total Other	\$

H. Indirect Costs. Indirect costs are allowable under this program 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) must be provided to FEMA before indirect costs are charged to the award.

Description	Computation	Cost
		\$
	Total Indirect Costs	\$

Budget Summary - When the budget worksheet is complete, transfer the totals for each category to the spaces below. Compute the total direct costs and the total project costs. Indicate the amount of Federal funds requested and the amount of non-Federal funds that will support the project.

Budget Category	Federal Amount	Non-Federal Amount
A. Personnel	\$ 11,250	\$ 3,750
B. Fringe Benefits	\$ 5,625	\$ 1,875
C. Travel	\$ 337.50	\$ 112.50
D. Equipment	\$ 750	\$ 250
E. Supplies	\$ 225	\$ 75
F. Consultants/Contracts	\$ 30,337.50	\$ 10,112.50
G. Other	\$ 0	\$ 0
H. Indirect Costs	\$ 0	\$ 0

Total Requested Federal Amount	Total Non-Federal Amount
\$ 48,525	\$ 16,175
Combined Total Project Costs	
\$ 64,700	

Appendix G – FY 2018 TSGP Security Plan Requirements

The following information regarding security plan requirements is provided in 6 U.S.C. § 1134(c)(2):

Security plans should include the following, as appropriate:

- A prioritized list of all items included in the public transportation agency's security assessment that have not yet been addressed;
- A detailed list of any additional capital and operational improvements identified by DHS or the public transportation agency and a certification of the public transportation agency's technical capacity for operating and maintaining any security equipment that may be identified in such list;
- Specific procedures to be implemented or used by the public transportation agency in response to a terrorist attack, including evacuation and passenger communication plans and appropriate evacuation and communication measures for the elderly and individuals with disabilities;
- A coordinated response plan that establishes procedures for appropriate interaction with state and local law enforcement agencies, emergency responders, and Federal officials in order to coordinate security measures and plans for response in the event of a terrorist attack or other major incident;
- A strategy and timeline for conducting training under 6 U.S.C. § 1137
- Plans for providing redundant and other appropriate backup systems necessary to ensure the continued operation of critical elements of the public transportation system in the event of a terrorist attack or other major incident;
- Plans for providing service capabilities throughout the system in the event of a terrorist attack or other major incident in the city or region which the public transportation system serves;
- Methods to mitigate damage within a public transportation system in case of an attack on the system, including a plan for communication and coordination with emergency responders; and
- Other actions or procedures as the Secretary of Homeland Security determines are appropriate to address the security of the public transportation system.

Appendix H – FY 2018 TSGP Helpful Hints for Applicants

Are the following components included in the application package?

- SF-424, SF-424A, SF-424B, SF-LLL
- IJs for projects
- Detailed budgets containing only allowable costs
- Five-Year Security Capital and Operational Sustainment Plan (Opack)

Are the following items addressed within the IJ narratives and detailed budgets?

- Do the IJ and the detailed budget only include allowable costs?
- Are all of the expenses in the detailed budget addressed in the IJ narrative? (For example, a camera equipment budget line item should be addressed in narrative form in the IJ as it pertains to the overall security program.)
- Does the information in the detailed budget align with the budget summary in the IJ narrative?
- Are planning and design costs to include remediation planning clearly delineated in the budget, as separate from implementation/installation costs? (Planning and design costs may be released before implementation/installation costs, as planning and design costs do not require extensive EHP review.)
- Does the IJ clearly explain how the projects fit into a funding priority area (as identified in [Appendix B – Program Priorities](#))?
- Does the IJ establish a clear linkage to building or sustaining one or more core capabilities in the Goal?
- Does the IJ discuss how this investment will decrease or mitigate risk?
- Does the IJ discuss how the project will mitigate an identified vulnerability from a threat/vulnerability assessment?
- Does the IJ describe how the project is necessary, appropriate, and timely given the current security posture?
- Does the IJ detail whether the project is scalable? If so to what degree (discuss the impact of scaling down funding on the overall effectiveness of the project)?
- Is the cost effectiveness of the project clearly explained in the IJ? How does this project provide a high security return on investment?
- Does the IJ discuss how/if the project can be implemented quickly?
- How does the project reflect security discussions and mitigation strategies discussed by the RTSWG?
- Are timelines realistic and detailed?
- Are possible hurdles addressed in a clear and concise fashion?
- If requesting funding for both new OPacks and sustainment of existing OPacks, does the IJ discuss which is the higher priority for the agency and why? Does the IJ indicate the number of existing teams already in place, either through agency funding or funded through the TSGP?
- If requesting TTAL consequence management, does the IJ clearly detail the prevention and protection measures already in place, or funded to be completed?