

**The Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)
Fiscal Year 2019 Intercity Bus Security Grant Program (IBSGP)**

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 four 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>.

A. Program Description

Issued By

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

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

97.057

Assistance Listings Title (formerly CFDA Title)

Intercity Bus Security Grant Program

Notice of Funding Opportunity Title

Intercity Bus Security Grant Program

NOFO Number

DHS-19-GPD-057-00-01

Authorizing Authority for Program

Section 1532 of the *Implementing Recommendations of the 9/11 Commission Act of 2007* (Pub. L. No. 110-53) (6 U.S.C. § 1182)

Appropriation Authority for Program

Department of Homeland Security Appropriations Act, 2019, (Pub. L. No. 116-6)

Program Type

New

Program Overview, Objectives, and Priorities

Overview

The Fiscal Year (FY) 2019 Intercity Bus Security Grant Program (IBSGP) is one of four grant programs that constitute DHS/FEMA's focus on transportation infrastructure security activities. These grant programs are part of a comprehensive set of measures authorized by Congress and implemented by the Administration to help strengthen the Nation's critical infrastructure against risks associated with potential terrorist attacks. The IBSGP provides funds to intercity bus companies to protect critical surface transportation infrastructure and the traveling public from acts of terrorism, major disasters, and other emergencies. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, the IBSGP 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 Intercity Bus Security Grant Program supports the goal of Readyng the Nation for Catastrophic Disasters. We invite all of our stakeholders and partners to also adopt these priorities and join us in building a more prepared and resilient Nation.

Objectives

The objective of the FY 2019 IBSGP is to provide funds to eligible private operators of intercity over-the-road bus transportation systems to protect critical transportation infrastructure and travelling public from acts of terrorism, and to increase the resilience of the transit infrastructure.

Performance Metrics

Performance metrics for this program are as follows:

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

Priorities

Given the evolving threat landscape, it is incumbent upon DHS/FEMA to continuously evaluate the national risk profile and set priorities that help ensure appropriate allocation of scarce security dollars. In assessing the national risk profile for FY 2019, four priority areas emerge:

- 1) Enhancing the protection of soft targets/crowded places;
- 2) Enhancing weapons of mass destruction (WMD) and improvised explosive device (IED) prevention, detection, response, and recovery capabilities;
- 3) Enhancing cybersecurity; and
- 4) Addressing emergent threats, such as unmanned aerial systems (UAS).

Likewise, there are several enduring security needs that crosscut the Transportation Sector and form a second tier of priorities that help ensure a comprehensive approach to securing the Nation's transportation systems. These are:

- 1) Effective planning;
- 2) Training and awareness campaigns;
- 3) Equipment and capital projects; and

4) Exercises.

The table below provides a breakdown of these priority areas for the FY 2019 IBSGP, showing both the core capabilities impacted, as well as examples of eligible project types for each area. A detailed description of allowable investments for each project type is included in the [Preparedness Grants Manual](#).

Priority Areas	Core Capabilities Enhanced	Example Project Types
National Priorities		
Enhancing the Protection of Soft Targets/Crowded Places	Interdiction & disruption Screening, search & detection Access control & identity verification Physical protective measures	<ul style="list-style-type: none"> • Physical security enhancements at bus stations located in eligible Urban Area Security Initiative (UASI) cities <ul style="list-style-type: none"> ○ Security cameras (CCTV) ○ Security screening equipment for people and baggage ○ Access controls <ul style="list-style-type: none"> ▪ Fencing, gates, barriers, etc. • Remote disabling technology for over-the-road bus fleets
Enhancing WMD & IED Prevention, Detection, Response & Recovery Capabilities	Interdiction & disruption Screening, search & detection	<ul style="list-style-type: none"> • CBRNE detection equipment at bus stations located in historically eligible Urban Area Security Initiative (UASI) cities <ul style="list-style-type: none"> ○ Security screening equipment for people and baggage ○ Stand-off detection systems
Enduring Needs		
Effective Planning	Planning Risk management for protection programs & activities Risk & disaster resilience assessment Threats and hazards identification Operational coordination	<ul style="list-style-type: none"> • Development of: <ul style="list-style-type: none"> ○ System-wide security risk management plans, to include cyber ○ Continuity of operations plans ○ Response plans/station action plans ○ Risk assessments ○ Asset-specific remediation plans • Efforts to strengthen governance integration between/among regional partners

Priority Areas	Core Capabilities Enhanced	Example Project Types
Training & Awareness Campaigns	Long-term vulnerability reduction Public information & warning	<ul style="list-style-type: none"> • Security training for employees, to include: <ul style="list-style-type: none"> ○ Basic security awareness ○ Active shooter/attacker • Public awareness/preparedness campaigns
Exercises	Long-term vulnerability reduction	<ul style="list-style-type: none"> • Security exercises to enhance protection, response, and coordination efforts related to the effects of a terrorist attack scenario

B. Federal Award Information

Award Amounts, Important Dates, and Extensions

Available Funding for the FY 2019 IBSGP: \$2,000,000

Period of Performance: 36 months

Extensions to the period of performance are allowed. For additional information on period of performance extensions, refer to the [Preparedness Grants Manual](#).

Projected Period of Performance Start Date: September 1, 2019

Projected Period of Performance End Date: August 31, 2022

Funding Instrument: Grant

C. Eligibility Information

Eligible Applicants

Private operators providing intercity over-the-road bus transportation that have also completed a vulnerability assessment and developed a security plan, which the Secretary of Homeland Security has approved as described in Section 1531 of the *Implementing Recommendations of the 9/11 Commission Act of 2007* (9/11 Act) (Pub. L. No. 110-53) (6 U.S.C. § 1181).

Private Operators are non-governmental entities that may include, but are not limited to sole proprietorships, affiliates, parent companies, and subsidiaries.

Eligibility Criteria

Eligibility for funding is *further limited* to applicants that meet one or both of the following criteria:

- Operate fixed-route intercity bus transportation providing services to a defined Urban Area Security Initiative (UASI) jurisdiction.
- Operate a charter bus service using over-the-road buses and provide a minimum of 50 trips annually to one or more defined UASI jurisdictions.

The following definitions are applicable for the purpose of meeting FY 2019 program eligibility requirements:

- **Charter bus service** is defined as a bus service that operates neither over fixed-routes nor on regular schedules. *Note: A charter bus service is characterized by the*

rental of a bus and the services of a driver to a person or group where all passengers embark and disembark at the same point. A charter bus service must use over-the-road buses.

- **Fixed-route intercity bus service** is defined as passenger transportation service provided to the general public for compensation over specified, predetermined, and published routes between cities or terminals using over-the-road-buses.
- An **over-the-road bus** is defined as a vehicle designated for long-distance transportation of passengers, characterized by integral construction with an elevated passenger deck located over a baggage compartment and at least 35 feet in length, with a capacity of more than 30 passengers. Only over-the-road buses are eligible for vehicle security enhancements through this program. Limousines, mini-coaches, school buses, or any other vehicle that does not fit the definition of an over-the-road bus are not eligible.
- A **trip** is defined as a single bus journey from an embarkation point to the furthest destination in that journey. For example, a trip from New York City to Denver to San Francisco would be considered a single trip. A trip is made to a defined UASI jurisdiction if at any point in the trip the bus stops in a UASI jurisdiction and embarks or disembarks passengers. For example, a trip from Newburgh, NY to Manhattan to Charleston, WV is a trip to a defined UASI jurisdiction if passengers embark or disembark in Manhattan.
- **UASI jurisdiction** is a high-risk urban area designated to receive Urban Area Security Initiative funding under the FY 2019 Homeland Security Grant Program (HSGP), as identified by the FY 2019 HSGP Notice of Funding Opportunity.

FY 2019 IBSGP UASI-Eligible Urban Areas

State/Territory	Urban Area
Arizona	Phoenix Area
California	Anaheim/Santa Ana Area
	Bay Area
	Los Angeles/Long Beach Area
	Riverside Area
	Sacramento Area
	San Diego Area
Colorado	Denver Area
District of Columbia	National Capital Region
Florida	Miami/Fort Lauderdale Area
	Orlando Area
	Tampa Area
Georgia	Atlanta Area
Hawaii	Honolulu Area
Illinois	Chicago Area

Maryland	Baltimore Area
Massachusetts	Boston Area
Michigan	Detroit Area
Minnesota	Twin Cities Area
Missouri	St. Louis Area
Nevada	Las Vegas Area
New Jersey	Jersey City/Newark Area
New York	New York City Area
Oregon	Portland Area
Pennsylvania	Philadelphia Area
	Pittsburgh Area
Texas	Dallas/Fort Worth/Arlington Area
	Houston Area
	San Antonio Area
Virginia	Hampton Roads Area
Washington	Seattle Area

Other Eligibility Criteria

Application Limitations

- Eligible applicants may only submit one application; and
- Each application may only include one investment justification (IJ).

Vulnerability Assessment and Security Plan

In order to be eligible for the FY 2019 IBSGP, operators must have developed or updated their organization's Vulnerability Assessment and Security Plan (VASP) that must be based on a security assessment, such as the Baseline Assessment for Security Enhancement (BASE) performed by Transportation Security Inspectors-Surface from the Transportation Security Administration (TSA). Private operators providing transportation with an over-the-road bus system must have completed or updated their VASP within the past three years before the opening of the FY 2019 IBSGP application period. Additionally, a copy of the VASP certification must be submitted along with the application in order to be considered eligible. Failure to include this certification will result in the application being deemed ineligible.

All operators must have completed or updated a VASP as required by Section 1531 of the 9/11 Act (6 U.S.C. § 1181) as follows:

- 1) Assessments and security plans should include, as appropriate:
 - Identification and evaluation of critical assets and infrastructure, including buses, platforms, stations, terminals, and information systems
 - Identification of vulnerabilities to those assets and infrastructure
 - Identification of gaps in physical security; passenger and cargo security; the security of programmable electronic devices, computers, or other automated

systems that are used in providing over-the-road bus transportation; alarms, cameras, and other communications systems and utilities needed for over-the-road bus security purposes, including dispatching systems; emergency response planning; and employee training

2) Security plans should also include, as appropriate:

- The identification of a security coordinator having authority to implement security actions, coordinate security improvements, and receive communications from appropriate federal officials regarding over-the-road bus security
- A list of needed capital and operational improvements
- Procedures to be implemented or used by the operator in response to a terrorist attack, including evacuation and passenger communication plans that include individuals with access and functional needs
- The identification of steps taken with state and local law enforcement agencies, emergency responders, and Federal officials to coordinate security measures and plans for response to a terrorist attack
- A strategy and timeline for conducting training to prepare front-line employees for potential security threats and conditions
- Enhanced security measures to be taken by the operator when the Secretary of Homeland Security declares a period of heightened security risk
- Plans for providing redundant and backup systems required to ensure the continued operation of critical elements of the operator's system in the event of a terrorist attack

For additional information on the above requirements, please contact highwaysecurity@tsa.dhs.gov. Project requests will not be considered until bus operators develop and certify vulnerability assessments and security plans. See below for a template VASP certification statement.

Vulnerability Assessment and Security Plan Certification Statement

Applicants must certify that they have had a vulnerability assessment completed and a security evaluation preparedness plan developed or updated within the last three years. Failure to submit this certification or modifying the language in this certification may result in an application not be considered for funding. Applicants are also required to submit their vulnerability assessments and security plans to DHS/FEMA upon request.

I, [insert name], as [insert title] of [insert name of bus company], certify that a vulnerability assessment has been completed and a security evaluation preparedness plan has been developed or updated for my company within the last three years.

Signature

Date

National Incident Management System (NIMS)

Prior to allocation of any Federal preparedness awards in FY 2019, recipients must adopt and/or maintain implementation of the National Incident Management System (NIMS). Please see the [Preparedness Grants Manual](#) for more information on NIMS.

Ineligible Applicants

Applicants that do not meet the requirements under “Eligible Applicants” in this Notice of Funding Opportunity Announcement, and Section 1531 of the 9/11 Act (6 U.S.C. § 1181).

Ineligible Service Categories:

- School buses
- Fixed service routes under contract to transit authorities within UASI jurisdictions
- Fixed service routes not stopping in qualifying UASI jurisdictions
- Intra-city trolley and/or tour services
- Bus company owners that are not operators
- Intra-city bus service is not eligible for funding under the FY 2019 IBSGP. Funding for intra-city bus security is addressed through the FY 2019 Transit Security Grant Program.

Ineligible Applications

- An application submitted by an entity that does not meet the eligibility requirements, as described in this Notice of Funding Opportunity;
- An application submitted by an eligible entity that is deficient in any of the documentary submission requirements, as described in this Notice of Funding Opportunity;
- An application submitted by an eligible applicant, when the submitter is not authorized to act on behalf of the potential recipient; or
- Regardless of an applicant’s intent, applications for funding that are deemed “Duplicate Applications” are generally ineligible. As an example, if two applications for the same potential recipient are submitted, both applications will be deemed “Duplicate Applications” and both may be ineligible. However, FEMA retains the discretion to fund one of those duplicate applications based on the criteria set forth in this NOFO.

Cost Share or Match

The FY 2019 IBSGP has a cost share requirement.

Cash (Hard Match): The only acceptable form of cost sharing is a hard match, meaning cash, by the recipient. In-kind contributions, also known as soft matches, are not acceptable for the recipient’s cost share requirement. Eligible IBSGP applicants shall agree to make available non-federal funds to carry out an IBSGP award in an amount equal to, and not less than, 50 percent of the total project cost as submitted in the application and approved in the award. If the total project cost is ultimately higher than anticipated and submitted at the time of application, the recipient is responsible for all additional costs. If the total project cost is less than the amount anticipated at the time of award, the recipient must ensure that it matches the

federal funds expended with an amount equal to, and not less than, 50 percent in non-Federal funds. The recipient's contribution should be specifically identified for each proposed project. The non-federal contribution has the same eligibility requirements as the Federal share and must be justified as part of the project within the investment justification.

For example, if the federal award requires a 50 percent cost share and the total project cost is \$100,000, then:

- Federal share is 50 percent of \$100,000 = \$50,000
- Recipient cost share is 50 percent of \$100,000 = \$50,000

With this example, if the total project cost ends up being \$120,000, the federal share would remain at 50 percent of the original project cost of \$100,000 (i.e., \$50,000). Conversely, if the total project cost ends up being \$80,000, then Federal share would be \$40,000 versus \$50,000. In that case, the recipient would owe FEMA this \$10,000 as the difference between the 50 percent cost share under the original project cost versus the decreased actual project cost.

These cash, hard-match contributions must consist of eligible costs and must be identified as part of the submitted application. A cash match includes cash spent for project related costs. The cost match requirement for the IBSGP award may not be met by funds from another federal grant or assistance program or funds used to meet matching requirements for another federal grant or assistance program, unless otherwise permitted by federal statute. Additionally, normal routine operational costs cannot be used as a cost match unless a completely new capability is being awarded.

Please see 2 C.F.R. § 200.306, as applicable, as well as the [Preparedness Grants Manual](#) for additional guidance regarding cost matching.

D. Application and Submission Information

Key Dates and Times

Date Posted to Grants.gov: **April 12, 2019**

Application Submission Deadline: **May 29, 2019 at 5:00 PM ET**

All applications **must** be received by the established deadline. The Non-Disaster (ND) Grants System has a date stamp that indicates when an application is submitted. Applicants will receive an electronic message confirming receipt of the full application. DHS/FEMA will not review applications that are not received by the deadline or consider these late applications 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 2, 2019

Anticipated Award Date: No later than September 30, 2019

Other Key Dates:

Event	Suggested Deadline For Completion
Obtaining DUNS Number	May 1, 2019
Obtaining a valid EIN	May 1, 2019
Updating SAM registration	May 1, 2019
Submitting initial application in Grants.gov	May 22, 2019
Submitting final application in ND Grants	May 29, 2019 5:00 pm ET

Agreeing to Terms and Conditions of the Award

By submitting an application, the applicant agrees to comply with the requirements of this NOFO and the terms and conditions of its award should it receive an award.

Address to Request Application Package

See the [Preparedness Grants Manual](#) for information on requesting and submitting an application.

Content and Form of Application Submission

See the [Preparedness Grants Manual](#) for information on requesting and submitting an application.

Unique Entity Identifier and System for Award Management (SAM)

See [Preparedness Grants Manual](#) for information of the Unique Entity Identifier and System for Award Management (SAM).

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 initial applications online through [Grants.gov](#) and to submit final applications through [ND Grants](#).

How to Register to Apply through Grants.Gov

See the [Preparedness Grants Manual](#) for information on requesting and submitting an application.

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

See the [Preparedness Grants Manual](#) for information on requesting and submitting an application.

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

After submitting the initial application in [Grants.gov](https://www.grants.gov), eligible applicants will be notified by DHS/FEMA and asked to proceed with submitting their complete application package in [ND Grants](https://www.ndgrants.gov). 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, seven days before the application deadline. Early registration will allow applicants to have adequate time to start and complete their application.

In [ND Grants](https://www.ndgrants.gov) 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](https://www.ndgrants.gov):

- Standard Form 424D, Standard Assurances (Construction) if applying for funds to use for construction;
- Standard Form 424C, Budget Information (Construction) if applying for grants to support construction;
- Investment Justification;
- Detailed Budget(s); and
- Indirect Cost Agreement, if applicable.

IBSGP Specific Application Instructions

All applicants will submit their IBSGP grant application, associated Investment Justification (IJ), their VASP Certification Statement, and a Detailed Budget as file attachments within ND Grants prior to the application deadline.

Investment Justification

As part of the FY 2019 IBSGP application process, applicants must develop a single formal IJ that addresses each initiative being proposed for funding, including a project's Management and Administration (M&A) costs. 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 DHS/FEMA.

IBSGP 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 must provide information in the following categories for their single 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 their IJ as part of the FY 2019 IBSGP:

Organization Name_Project Name

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](#). 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 Environmental Planning and Historic Preservation (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 IBSGP:

Organization Name_Project Name

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 IBSGP, 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.

Timely Receipt Requirements and Proof of Timely Submission

As application submission is a two-step process, the applicant with the Authorized Organization Representative (AOR) role who submitted the application will receive an acknowledgement of receipt, a tracking number (GRANTXXXXXXXX) from Grants.gov, and an Agency Tracking Number (EMX-2019-XX-XXXX) with the successful transmission of the initial application. This notification does **not** serve as proof of timely submission as the application is not complete until it is submitted in ND Grants. All applications must be received in ND Grants by 5:00 PM Eastern Time on May 29, 2019. Proof of timely submission is automatically recorded by ND Grants. An electronic date/time stamp is generated within the system when the application is successfully received by ND Grants. Additionally, the applicant(s) listed as contacts on the application will receive a system-generated email to confirm receipt.

Intergovernmental Review

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

Funding Restrictions

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.

Direct Costs

See [Preparedness Grants Manual](#) for information on Direct Costs.

Construction and Renovation

Construction and renovation costs for modifying terminals, garages, and facilities, including terminals and other over-the-road bus facilities owned by state or local governments, to enhance their security are allowed under this program only as described in this NOFO. For more information, please reference the [Preparedness Grants Manual](#).

Operational Overtime

Operational Overtime costs are allowed under this program only as described in this NOFO.

Travel

Domestic travel costs are allowed under this program only as described in this NOFO. International travel is not an allowable cost under IBSGP.

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 IBSGP, see the [Preparedness Grants Manual](#).

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. M&A activities are those defined as directly relating to the management and administration of IBSGP funds, such as financial management and monitoring. M&A 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 the [Preparedness Grants Manual](#) section 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 and funds applied to the award's cost share generally cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of such specifications. A State must follow the same policies and procedures it uses for procurements of its non-Federal funds, pursuant to 2 C.F.R. § 200.317.

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. The recipient 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.NDGrants.gov). Grant writers may assist in a variety of ways up to and including the actual submission of the application. Ultimately, however, the applicant that receives an award is solely responsible for all grant award and administrative responsibilities **and an employee of that applicant must be one of the listed points of contact.**

By submitting the application, applicants certify that 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.

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 its own funds during the application preparation and submission period; if the applicant subsequently receives an award, the applicant 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 the 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.

Pursuant to 2 C.F.R. Part 180, recipients may not use federal grant funds to reimburse any entity, including a grant writer or preparer, if that entity is presently

suspended or debarred by the Federal Government from receiving funding under federally funded grants or contracts. Recipients must verify that the contractor is not suspended or debarred from participating in specified federal procurement or non-procurement transactions pursuant to 2 C.F.R. § 180.300. FEMA recommends recipients use SAM.gov to conduct this verification.

Furthermore, regardless of whether any grant writer fees were requested, unless a single contract covering both pre- and post-award services was awarded to the grant writer and procured in compliance with 2 C.F.R. §§ 200.317 – 200.326, federal funds and funds applied to the award's cost share cannot be used to pay the grant writer to provide post-award services.

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.

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

Indirect costs are allowable under this program as described in 2 C.F.R. § 200.414, but in order to charge indirect costs to this award, applicants must have an approved indirect cost rate and a fully executed indirect cost agreement that was negotiated with their cognizant Federal agency. A copy of the fully executed agreement, which includes the approved rate, is required at the time of application and must be provided to DHS/FEMA before indirect costs are charged to the award.

Except for entities covered under 2 C.F.R. Part 200, Appendix VII, § D.1.b, if a recipient has never received a negotiated indirect cost rate, under 2 C.F.R. 200.414(f), it may charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely.

Excess Funds

After completing the initial project proposed in the recipient's application, some recipients may have unexpended funds remaining in their budgets. These excess funds may result from any combination of under-budget acquisition activities or competitive procurement processes. In such cases, excess funds must be returned to FEMA upon project completion.

Emergency Communications and Resilience

Please see the [Preparedness Grants Manual](#) for more information on Emergency Communications guidance.

E. Application Review Information

Application Evaluation Criteria

Programmatic Criteria

Additionally, FY 2019 IBSGP applications will be evaluated through a review process for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed investments. Applicants can score a maximum of 100 points in this evaluation

process.

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

Information that would assist in the feasibility and effectiveness determination of the IJ's request:

- 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)
- Project schedule

The IJ should provide details on specific needs to be addressed, vision, goals, and objectives. It should also provide evidence of how the project fits into an overall effort to meet critical infrastructure security requirements, and how the investment provides a significant security impact.

Possible Review Panel Funding Guidelines Score: 0-20 points

Cost effectiveness. Projects will be evaluated and prioritized based on the expected impact on security relative to the investment. The IJ should provide quantitative 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.

Possible Review Panel Cost Effectiveness Score: 0-15 points

Ability to reduce risk of catastrophic events. Projects will be evaluated and prioritized based on their ability to reduce risk. The IJ should demonstrate an ability to reduce risk, providing quantitative evidence of the project's security impact, potential consequences of not funding the project, and a strategy to address specific risk areas. The IJ should also reflect robust regional coordination and an investment strategy that institutionalizes regional security strategy integration in the Nation's highest risk metropolitan areas.

Possible Review Panel Risk Reduction Score: 0-35 points

Sustainability without additional Federal funds and leveraging of other funding. Projects will be evaluated and prioritized regarding the extent to which they exhibit a likelihood of success, or continued success, without requiring additional Federal assistance.

Possible Review Panel Sustainability Score: 0-10 points

Timeline. Projects will be evaluated and prioritized on the ability of the applicant to complete the proposed project within submitted timelines. The IJ should provide a timeline and demonstrate evidence of ability to complete the project within submitted timeline based on proposed strategy, identified implementation challenges, management and resource plan, and reasonableness of anticipated schedule.

Possible Review Panel Timelines Score: 0-10 points

Risk to critical infrastructure. The FY 2019 IBSGP will use risk-based prioritization consistent with DHS policy. This score is calculated using a risk process developed and maintained by TSA and provided separately in accordance with proper Sensitive Security Information (SSI) handling protocol. Scores from TSA are informed by their risk methodology ranking, the relative risk of high-risk UASI jurisdictions, and giving higher priority to those with routes passing through underwater tunnels.

Possible Review Panel Critical Infrastructure Score: 0-10 points

Financial Integrity 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. Therefore, application evaluation criteria may include the following risk-based considerations of the applicant:

1. Financial stability;
2. Quality of management systems and ability to meet management standards;
3. History of performance in managing Federal awards;
4. Reports and findings from audits; and
5. Ability to effectively implement statutory, regulatory, or other requirements.

Supplemental Financial Integrity Review

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

- DHS/FEMA is required to review and consider any information about the applicant in the designated integrity and performance system accessible through the System for Award Management (SAM), which is currently the Federal Awardee Performance and Integrity Information System (FAPIIS) and is also accessible through the [SAM](#) website.
- An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a Federal awarding agency previously entered.
- DHS/FEMA will consider any comments by the applicant, in addition to the other information in FAPIIS, 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.

Review and Selection Process

Recipients must comply with all administrative requirements described herein — including the submission of the IJ, budget, and other application materials as required. Having met all

administrative requirements, the application will be scored based on a methodology that will ensure consistent and accurate evaluations of projects and proposals.

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 and scored by the National Review Panel (NRP). Each panelist will independently review each application and score it based on the above criteria using a standard scoring sheet.
- The NRP will meet to review and compare scores and discuss 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 for each project. The total score will consist of the sum of the Funding Guidelines score (0-20), Cost Effectiveness score (0-15), Risk Reduction score (0-35), Sustainability score (0-10), Timeline score (0-10), and Risk to Critical Infrastructure score calculated by TSA (0-10).
- The NRP results, scoring summary, and funding recommendations, will be reviewed by an Executive Committee made up of senior leadership from DHS/FEMA and TSA.
- The output of the Executive Committee review will be the final list 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 recommendations to senior DHS leadership through multiple briefings.
- Ultimately, IBSGP authorizing statutes place final funding determinations at the discretion of the Secretary of Homeland Security.
- The final list of approved projects will then be forwarded to GPD for final award processing.
- DHS/FEMA may conduct additional pre-award vetting of proposed recipients, to include: (1) Whether any of the bus companies have been declared an "imminent hazard" or fined by either the Federal or any state department of transportation and (2) whether any of the bus company owner/operators have been convicted of human trafficking or criminally transporting illegal immigrants on buses.

F. Federal Award Administration Information

Notice of Award

Please see the [Preparedness Grants Manual](#) for information on Notice of Award.

Administrative and National Policy Requirements

Please see the [Preparedness Grants Manual](#) for information on Administrative and National Policy requirements, including the DHS Standard Terms and Conditions.

Reporting

Please see the [Preparedness Grants Manual](#) for information on Reporting, including financial, programmatic, and closeout reporting and disclosing information per 2 C.F.R. § 180.335.

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 DHS/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 Grant Operations Help Desk via e-mail at ASK-GMD@fema.gov.

FEMA Regional Offices

DHS/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@dhs.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

GPD has developed the [Preparedness Grants Manual](#) to guide applicants and recipients of grant funding on how to manage their grants and other resources. Recipients seeking guidance on policies and procedures for managing Preparedness Grants should reference the manual for further information. Examples of information contained in the [Preparedness Grants Manual](#) include:

- Conflicts of Interest in the Administration of Federal Awards and Subawards
- Extensions
- Monitoring
- Procurement Integrity
- Other Post-Award Requirements

In response to recent disasters, FEMA has introduced a new lifelines construct, in order to enable the continuous operation of government functions and critical business essential to human health, safety, or economic security during and after a disaster. To learn more about lifelines, please refer to the [Preparedness Grants Manual](#), or visit <http://www.fema.gov/national-planning-frameworks>.