



Public Safety Interoperable Communications (PSIC) Grant Program

FREQUENTLY ASKED QUESTIONS

The following questions and answers are summarized from the National Telecommunications and Information Administration (NTIA) Investment Justification Workshops. These workshops occurred September 24 through October 1, 2007 in Dallas, Texas; Denver, Colorado; Newark, New Jersey; and Los Angeles, California. A recording of the Denver Workshop along with all relevant PSIC information can be found on the NTIA website at <http://www.ntia.doc.gov/psic>.

Q1 *What is the PSIC Grant Period of Performance?*

A1. The PSIC Grant Program Period of Performance began on October 1, 2007 and continues until September 30, 2010. A Special Condition has been placed on the grants so that the applicant cannot expend, obligate, or drawdown federal funds until approval of the Statewide Communications Interoperability Plan (SCIP) and Investment Justifications (IJ). From the period between October 1, 2007 and the approval in early 2008, applicants can (at their own risk) incur matching costs associated with the acquisition, deployment, and management and administration (M&A) of the interoperability project. Applicants should not obligate federal dollars prior to NTIA approval of the Investment.

Q2. *What happens to the State's allocated funds at the end of the period of performance (September 30, 2010)?*

A2. All PSIC grant funds must be **EXPENDED** by September 30, 2010. All funds not expended by September 30, 2010 must be remitted by the grantee to NTIA, which will deobligate the funds and return them to the U.S. Treasury.

Q3. *What is the period of time that States and Territories may use the funds related to the SCIP? Do these Statewide Planning funds require a match?*

A3. Up to 5 percent of the total funds allocated to a State or Territory will be reimbursed for costs incurred directly related to incorporating the PSIC criteria into the SCIP. The period for which costs are reimbursable started on April 1, 2007 and ends on December 3, 2007 with the submission of the SCIP. Only costs incurred during this period and requested by the State or Territory's PSIC application are eligible for reimbursement. The costs related to the Statewide Plans do not have a match requirement.

Q4. *Can a State or Territory receive an extension to the December 3, 2007 submission deadline?*

A4. December 3, 2007 is the final deadline for States and Territories to submit the SCIP and IJ to the DHS National Preparedness Directorate (NPD) secure portal. The PSIC Program will not accept late submissions nor will it extend the deadline. States and Territories that miss the December 3 deadline risk losing their PSIC funds.



Q5. Can a State or Territory submit the shell plan of Investments on December 3 instead of the final slate of projects?

A5. Pursuant to the PSIC program regulations, a State or Territory should submit its final slate of Investments for the State, local, tribal government, and authorized non-government entities. Some States have reported that their competitive process will not be fully complete by the December 3 deadline. States and Territories should be aware that only providing a shell plan for an Investment may delay the approval of an Investment and the release of PSIC funds, until the final slate of projects has been provided.

Q6. What is the timeline for the IJ and SCIP review process?

A6. By December, NTIA will solicit, select, and train peers to conduct a review of SCIPs and IJs for compliance with PSIC requirements. After being trained, the peers will conduct individual reviews and then gather for a panel review in February 2008. Based on peer and staff recommendations, the Assistant Secretary of Commerce will authorize the release of funding for approved IJs in March/April 2008. States and Territories may also be contacted as part of the review to submit additional information if their SCIP or IJ neglected to meet the PSIC requirements. The SCIP must be approved by the DHS Office of Emergency Communications prior to the approval of funding for the IJ and individual Investments. IJs and SCIPs will be reviewed concurrently.

Q7. Can a State or Territory submit the IJ package for more than what is allocated?

A7. No. The total Investment Justification package should not exceed the total award for the State or Territory, which is consistent with the amount as published in the revised PSIC Grant Guidance.

Q8. Must every criterion in the IJ elements be addressed in order to be compliant?

A8. No. All of the criteria may not be applicable, but you should address all that are relevant to your Investment.

Q9. Should a Memorandum of Understanding (MOU) be submitted as part of the IJ? What happens if an MOU is underdevelopment and not yet signed?

A9. Yes, existing MOUs should be noted in the Governance section of the Investment. MOUs may also be included with the IJ/SCIP submission through the NPD Secure Portal (note that only pictures can be attached into the IJ Template "Attachment" Section). If an MOU is under development, it should be noted in Section III.C with an anticipated completion date.



Q10. What level of budget detail is required in the IJ? Should each Investment reflect this information?

A10. The PSIC Grant Guidance and IJ Reference Guide outline the budget information that should be included in your IJ. Inadequate budget details in an Investment may delay the approval and the release of PSIC funds.

Q11. How much detail will be required on the matching source for the IJ submission?

A11. By December 3, you should provide the projected source of the matching funds for your Investments.

Q12. Can the State use planning or training activities to meet the 20 percent match required for acquisition and deployment?

A12. No. The statute requires that the recipient provide, from non-federal sources, not less than 20 percent of the costs of acquiring and deploying the interoperable communications system. The matching costs must be met by the acquisition, deployment, or M&A expenses. Planning, coordination, and training costs do not require a match, and those categories will also not count towards meeting the acquisition and deployment match requirement.

Q13. Can the State decide to provide a cash match to meet the overall acquisition, deployment, and M&A costs of the program?

A13. Yes. The State can decide to provide a cash match, from non-federal sources, to meet the overall matching requirements for the acquisition, deployment, and M&A categories. The match needs to be expended in areas related to acquisition, deployment, and M&A and not in areas of planning, coordination, and training.

Q14. Does a match need to be provided for each Investment? Can one Investment have a higher matching share and one Investment have a lower matching share?

A14. A match does not need to be provided for each Investment. One Investment could provide a higher matching share and another Investment could provide a lower matching share, so long as at the aggregated State-level the costs associated with the overall acquisition and deployment categories have met the minimum requirement of the 20 percent match.

Q15. Are salaries and benefits qualified matches?

A15. The salary and benefits associated with someone working on or for the PSIC grant are eligible match sources. The funding for the salary and/or benefits must be from a non-federal source. The grantee must demonstrate and document the time, salary, and benefits costs. Salaries and benefits for existing employees, sworn officers, dispatchers,



grant writers, and other staff who do not directly contribute to the implementation of the project are not eligible costs to meet the matching requirement.

Q16. Does a state/local employee that moves from working on a state/local project to a PSIC project have to track their time in a time reporting system or are timesheets enough?

A16. Auditors prefer tracking via accounting systems. These systems should document PSIC-related salary and benefit costs. It is important for accounting and auditing purpose to demonstrate and document these activities.

Q17. Do we have to use or expend the match at the same rate as the grant funding?

A17. Yes. As stated in the PSIC Grant Guidance, the non-federal share, whether cash or in-kind, is expected to be paid out at the same general rate as the federal share. Some programmatic exceptions can be granted, if the grant recipient can show pending budget appropriations, bond initiatives, etc. Unless the Grants Officer allows an exception, the grant recipient should drawdown federal funds in proportion to demonstrated non-federal matching funds.

Q18. How are third party donations counted towards the PSIC match requirement?

A18. Third party donations are allowable, but they must be included as an allowable cost in accordance with OMB Circular A-87 and relate to the PSIC Grant Program. Additionally, the grantee has the burden to document the donation, including (but not limited to) fair market value for the donation, donor, date, and description of item/services. Discounts or rebates from vendors are not an allowable matching source.

Q19. Is a statewide interoperability project that is currently underway an allowable Investment under the PSIC program?

A19. To be an eligible project, each Investment must have a separate scope, schedule and budget to ensure against supplanting. If the State can identify distinct, unfunded phases of the project, the statewide interoperability project may be submitted as an Investment.

Q20. Are internal auditing costs associated with a contract auditor allowable?

A20. No. Audit costs fall into indirect cost category and are not allowed as an eligible cost. However, costs associated with monitoring of sub-grant recipients are allowable in the M&A category.

Q21. Is the Wireless Priority Service applicable to a standard wireless or cell system?

A21. The Department of Homeland Security's National Communications System (NCS) has implemented a Wireless Priority Service that provides various levels of priority to governments and responders on common carrier wireless systems. More information on this service can be found at www.wps.ncs.gov.



Q22. What is the definition of “multi-jurisdiction” or “multi-agency/discipline?”

A22. In order to meet the PSIC requirements, Investments must meet both the multi-jurisdiction and multi-agency/discipline requirements. A multiple jurisdictional project is a combination or group of more than one local, nongovernmental, or tribal entity, or any state or regionally-focused project. Multiple agencies and/or multiple disciplines projects should involve multiple function areas such as fire, law enforcement, emergency management, public health, public works, and communications centers.

Q23. What are some specific examples of eligible sub-recipients?

A23. Public safety agency can include, but are not limited to, law enforcement, fire, emergency medical services, emergency management, communication centers, public health, public works, transportation, and jails/corrections. Additionally, if a State or Territory uses an Information Technology department or agency to provide public safety communications support for towers, repeaters, microwave link connectivity, or frequency management, this agency would be an eligible sub-recipient.

Q24. What are some specific examples of ineligible sub-recipients?

A24. Public utilities and hospitals would be two examples of entities that are not eligible to be direct sub-recipients under the PSIC program. While they might benefit from the program through equipment usage, a local or State public safety agency needs to be the actual sub-recipient of the funds to purchase the equipment and to own it. There is nothing in the PSIC regulations that would preclude the State or local agency from housing and letting the public utilities or hospitals use some of the equipment for their interoperability needs.

Q25. Are there unique circumstances for Territories?

A25. Yes. One unique circumstance relates to the multi-jurisdictional requirement. Territories that are comprised of only one jurisdiction are still eligible to receive the PSIC funds. Second, the match requirement for certain Territories is different than for States, as described in the PSIC Grant Guidance - Revised August 16, 2007. The Territories might receive an “error” in the match and overall self-check boxes in the IJ Template. For the designated Territories, this is fine and it will be handled at the program level prior to the peer review process.

Q26. Can a State or Territory dedicate more funds to the Strategic Technology Reserve (STR) Investment, if the need is identified?

A26. Each State or Territory has a pre-determined minimum allocation already identified in the PSIC Grant Guidance - Revised August 16, 2007. A State or Territory may decide to dedicate more than the minimum allocation to the STR Investment.



Q27. *Must a State or Territory submit one Investment for the STR?*

A27. Unless the State or Territory is seeking a waiver of the presumptive funding allocation, a minimum of one Investment must be dedicated for the STR allocation.

Q28. *Can a local Investment serve as an STR?*

A28. Yes. A local STR project should be coordinated with your State or Territory to include it as part of the overall STR. An explanation describing the rationale behind a local Investment should be included in the IJ Template's STR section.

Q29. *What are the presumptive conditions that would exempt a State or Territory from the STR funding requirement?*

A29. There are three reasons that a State or Territory may seek a waiver on the STR presumptive funding amount, including (1) the capability currently exists, (2) a portion of the capability exists (and therefore the full STR presumptive funding amount is not necessary), or (3) the State or Territory has higher priority interoperability needs. The State or Territory should present a detailed written justification supporting its case to waive the STR or a portion of the STR presumptive funding allocation.

Q30. *If a State or Territory is interested in seeking the STR presumptive funding waiver, can it submit a detailed justification prior to the December 3 deadline?*

A30. Yes. A State or Territory may seek the STR waiver prior to the December 3 deadline. A formal letter with the detailed justification should be sent to the DHS Preparedness Officer.

Q31. *Please explain the pre-negotiated contracts to fulfill the STR requirement. What are the terms, durations and sustainability aspects?*

A31. Pre-negotiated contracts might include agreements with vendors or service providers to supply communications equipment or capabilities in the event of an emergency. These STR contracts should be paid within the period of performance, but the benefit may extend beyond the September 30, 2010 end date. The grant recipient is responsible for any additional costs that occur outside of the pre-negotiated contract and beyond the period of performance. The State or Territory is responsible for the sustainability beyond the contract period. It is not allowable for the grant recipient to "hold" PSIC funds until a major disaster or emergency occurs.

Q32. *Should the State plan to use the STR on a daily basis or keep it pre-positioned in a safe place?*

A32. This will vary for each State and Territory. States and Territories are required to establish the STR to pre-position or secure interoperable communications in advance in an emergency or major disaster. The STR should be ready for deployment in an



emergency, but it is up to the State whether that solution is pre-positioned or used daily. In some cases, the State might decide to do a combination of both options and keep some of the STR pre-positioned and use some of it on a daily basis.

Q33. How is the drawdown of funds for this grant program different than other Homeland Security Grant Program (HSGP) grants?

A33. There are two important differences in the drawdown process for the PSIC Grant Program from HSGP. First, grantees will only be permitted to drawdown PSIC funds in proportion to demonstrated non-federal matching funds. Second, grantees may elect to drawdown funds up to 30 days prior to the expenditure/disbursement, which is different than the 120 days allowed in HSGP.

Q34. Will PSIC have similar reporting requirements to HSGP?

A34. The reporting requirements for the two programs are the same. Following the PSIC awards, a State or Territory and its sub-recipients will be responsible for providing updated obligation and expenditure information through the Biannual Strategy Implementation Reports (BSIR.) The BSIR is due 30 days after the end of the reporting period.

Q35. The SF-269a is required to be submitted by the end of October. How should the total allocation and match be shown without knowing the acquisition and deployment investment breakdown?

A35. The SF-269a reporting form only requires the grant recipient to report the total outlays for both the recipient share and the federal share. For the quarter-ending September 30, 2007, only planning costs will be included in the SF-269a, which do not require a match. For the future reports in which a matching portion is required, the grant recipient should know the outlays as they align with the cost categories of planning, coordination, training, acquisition, deployment, and M&A. The Financial State Report (FSR) forms are available online through the DHS Payment and Reporting System.

Q36. Can States and Territories submit National Environmental Policy Act (NEPA) documents for review simultaneously with their SCIP and IJ submissions?

A36. Yes. Grantees can submit NEPA documents for simultaneous review with their SCIP and IJ. If the State or Territory does not have its NEPA documentation ready to submit at the December 3 deadline, the grantee can submit the NEPA documentation anytime thereafter for review. In order to help the grantee, NTIA is preparing a NEPA packet that will be posted to the NTIA web site soon.