



**Homeland
Security**

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TO: All State Administrative Agency Heads
All State Administrative Agency Points of Contact
All Core City/Core County Points of Contact
All State Homeland Security Directors

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SUBJECT: Update on Allowable Training Expenditures

The Office for Domestic Preparedness (ODP) in the Office of State and Local Government Coordination and Preparedness (SLGCP) encourages States, territories, and Urban Areas to use funds to enhance the capabilities of State and local emergency preparedness and response personnel through development of a State homeland security training program. Allowable training-related costs under SLGCP grant programs include: 1) establishment of chemical, biological, radiological, nuclear, and explosives (CBRNE) terrorism and cyber security training programs through existing training academies, universities or junior colleges; and 2) overtime and backfill costs associated with attendance at SLGCP-sponsored and -approved CBRNE and cyber security training courses.

In support of these critical training efforts, this document provides clarification on the following important issues as they relate to funding in current and previous fiscal years:

- Eligibility of Designated Trainers to Participate in SLGCP Training
- Eligibility of Search and Rescue, Special Weapons and Tactics (SWAT), and Medical Trauma Courses
- Eligibility of Hazardous Materials Courses
- Attending Other Federal Courses Related to CBRNE Terrorism
- Attending Non-SLGCP Courses Related to CBRNE Terrorism
- Developing and Institutionalizing Non-SLGCP Courses
- Status of Conditional Approvals of Non-SLGCP Courses

1. Definitions:

- **SLGCP courses:** those courses developed for and or delivered by institutions and organizations funded by the Office of State and Local Government Coordination and Preparedness
- **Federal courses related to CBRNE terrorism:** those courses developed for and or delivered by institutions funded by Federal entities other than SLGCP which fall within

the SLGCP mission scope to prepare State and local personnel to prevent, respond to, and recover from acts of terrorism involving CBRNE weapons. The SLGCP Eligible Terrorism Training Courses list is available at www.ojp.usdoj.gov/odp/training.htm and will be updated regularly as additional courses become available.

- **Non-SLGCP courses:** those courses developed for and or delivered by institutions or organizations other than Federal entities or SLGCP

2. Eligibility of Designated Trainers to Participate in SLGCP Training

States and Urban Areas are encouraged to send personnel who serve as designated and/or certified trainers within the State or Urban Area to SLGCP train-the-trainer courses in order to become certified SLGCP trainers. Attendees must be a designated trainer but are not required to currently serve in an “active” emergency responder role. This allowance facilitates the institutionalization of SLGCP training at the State and Urban Area level.

3. Eligibility of Search and Rescue, SWAT, and Medical Trauma Courses

On September 1, 2004, ODP issued Information Bulletin #132 on the Interagency Security Planning effort. In this bulletin, ODP expanded the allowable use of grant funds to support additional training in the areas of search and rescue, SWAT, and medical trauma provided certain requirements were met. The following sections provide further detail on these initiatives.

A. Eligibility of Search and Rescue Courses

States and Urban Areas shall conduct search and rescue training in compliance with:

- NFPA 1670, *Standard on Operations and Training for Technical Rescue and Search Incidents*
- NFPA 1006, *Standard for Rescue Technician Professional Qualifications*

Only Urban Search and Rescue (USAR) courses approved by FEMA and delivered by FEMA-certified providers are eligible for use of SLGCP funds. A list of these courses and providers will be maintained by SLGCP in coordination with FEMA.

The training must not supplant existing resources, but rather must build additional capabilities above and beyond those that currently exist. Any additional capabilities pursued through these training opportunities must meet a specific need identified through the homeland security assessment process and must comport with the State or Urban Area Homeland Security Strategy.

If the USAR course fully addresses the fire service and or hazardous materials sections included in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*, no additional CBRNE-specific training is necessary for eligibility purposes. However, if the USAR course does **not** fully address these sections included in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*, then the student must also complete follow-on CBRNE awareness training within a reasonable timeframe in order for the USAR course to be considered an allowable use of SLGCP funds.

These USAR courses are intended to build a critical capacity at the State and local levels. **The execution of this training in the stated capacity-building context is unrelated to designation of national US&R teams. Therefore, States and UASI jurisdictions may not request such designation based on training.**

B. Eligibility of SWAT Courses

SWAT courses are eligible for support through SLGCP funds, provided that the training meets the following requirements:

- The training must not supplant existing resources, but rather must build additional capabilities above and beyond those that currently exist. Any additional capabilities pursued through these training opportunities must meet a specific need identified through the homeland security assessment process and must comport with the State or Urban Area Homeland Security Strategy.
- States and Urban Areas shall conduct training in compliance with State and local regulations and policies governing the certification of SWAT personnel.
- Trainees shall be sworn officers and shall have completed the basic Law Enforcement training accredited by the appropriate State-level criminal justice organization.
- Training shall be conducted by instructors certified by a State or national level criminal justice organization.
- The State or Urban Area shall ensure that a safety plan is implemented in compliance with Federal, State, and/or local regulations and polices governing the training of SWAT personnel.
- If a SWAT course fully addresses the law enforcement sections included in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*, no additional CBRNE-specific training is necessary for eligibility purposes. However, if the SWAT course does **not** fully address the law enforcement sections included in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*, then the student must also complete follow-on CBRNE awareness training within a reasonable timeframe in order for the SWAT course to be considered an allowable use of SLGCP funds.

C. Eligibility of Medical Trauma Courses

Medical trauma courses are eligible for support through SLGCP funds, provided that the training meets the following requirements:

- The training must not supplant existing resources, but rather must build additional capabilities above and beyond those that currently exist. Any additional capabilities pursued through these training opportunities must meet a specific need identified through the homeland security assessment process and must comport with the State or Urban Area Homeland Security Strategy.
- States and Urban Areas shall conduct training in compliance with NFPA 473, *Standard for Competencies for EMS Personnel Responding to Hazardous Materials Incidents* or applicable standards governing the health care community.

- States and Urban Areas shall conduct training in compliance with State and local regulations and policies governing the certification of EMS providers.
- States or Urban Areas shall coordinate their efforts with the closest Metropolitan Medical Response System jurisdiction.
- Trainees shall have completed a basic Emergency Medical Technician (EMT) certification per the State or local accreditation requirements. This type of training may not be funded with ODP monies.
- If a medical trauma course fully addresses the emergency medical services sections included in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*, no additional CBRNE-specific training is necessary for eligibility purposes. However, if the foundational medical trauma course does **not** fully address the emergency medical services sections included in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*, then the student must also complete follow-on CBRNE awareness training within a reasonable timeframe in order for the medical trauma course to be considered an allowable use of SLGCP funds.

4. Eligibility of Hazardous Materials Courses

Hazardous materials courses—including basic, operations, and technician level courses—are eligible for support through SLGCP funds **only** if the course fully addresses the hazardous materials sections included in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*. If the hazardous materials course does **not** fully address the hazardous materials sections included in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*, then the course is not considered an allowable use of SLGCP funds.

The training must not supplant existing resources, but rather must build additional capabilities above and beyond those that currently exist. Any additional capabilities pursued through these training opportunities must meet a specific need identified through the homeland security assessment process and must comport with the State or Urban Area Homeland Security Strategy.

5. Attending Other Federal Courses Related to CBRNE Terrorism

States are no longer required to submit requests for personnel to attend certain Federal courses that fall within the SLGCP mission scope of preparing State and local personnel to prevent, respond to, and recover from acts of terrorism involving CBRNE weapons. In lieu of requesting approval, States and Urban Areas are required to submit information via the training section of the ODP website (www.ojp.usdoj.gov/odp/training.htm) on all Federal training they are supporting with SLGCP funds. This information consists of such information as course title, level of the training, the training provider, the date of the course, the number of individuals to be trained, and the sponsoring jurisdiction.

Several broad categories of courses will automatically be included in the list of eligible Federal courses:

- All National Incident Management System (NIMS) training approved by the NIMS Integration Center (NIC) is eligible for use of SLGCP funds.
- All Incident Command System (ICS) training offered through the National Fire Academy and the Emergency Management Institute is eligible for use of SLGCP funds. This guidance applies to resident training, train-the-trainer, and field delivery of courses.

In conjunction with the release of FY2005 Homeland Security Grant Program guidance, SLGCP has published a list of eligible Federal courses that fall within its mission scope. The list is posted on the training section of the ODP website (www.ojp.usdoj.gov/odp/training.htm) and will be updated regularly as additional courses become available.

These courses must build additional capabilities that 1) meet a specific need identified through the homeland security assessment process, and 2) comport with the State or Urban Area Homeland Security Strategy.

Federal funds must be used to supplement—not supplant—existing funds that have been appropriated for the same purpose. Thus, if the State or Urban Area has already budgeted for personnel to attend courses, SLGCP funds may only be used to send additional individuals above and beyond those previously budgeted.

6. Attending Non-SLGCP Courses Related to CBRNE Terrorism

States and Urban Areas are no longer required to request approval for personnel to attend non-SLGCP courses that fall within the SLGCP mission scope of preparing State and local personnel to prevent, respond to, and recover from acts of terrorism involving CBRNE weapons. States and Urban Areas are instead required to submit information via the training section of the ODP website (www.ojp.usdoj.gov/odp/training.htm) on all non-SLGCP training which they are supporting with SLGCP funds. This information consists of such information as course title, level of the training, the training provider, the date of the course, the number of individuals to be trained, and the sponsoring jurisdiction. States or Urban Areas intending to use SLGCP funds to support attendance at non-SLGCP courses must ensure that these courses:

- Fall within the SLGCP mission scope to prepare State and local personnel to prevent, respond to, and recover from acts of terrorism involving CBRNE weapons;
- Build additional capabilities that 1) meet a specific need identified through the homeland security assessment process, and 2) comport with the State or Urban Area Homeland Security Strategy;
- Address the specific tasks articulated in the *ODP Emergency Responder Guidelines* and the *ODP Homeland Security Guidelines for Prevention and Deterrence*;
- Address the specific tasks and capabilities articulated in the Universal Task List and Target Capabilities List, as they become available;
- Comport with all applicable Federal, State, and local certification and regulatory requirements.

Federal funds must be used to supplement—not supplant—existing funds that have been appropriated for the same purpose. Thus, if the State or Urban Area has already budgeted for

personnel to attend courses, SLGCP funds may only be used to send additional individuals above and beyond those previously budgeted.

7. Developing and Institutionalizing Non-SLGCP Courses

States and Urban Areas intending to either 1) develop a new course or 2) institutionalize an existing non-SLGCP course must follow the SLGCP course approval process, which is being updated for FY 2005. This revised course approval process will facilitate the sharing of best practices among States and Urban Areas and will help reduce duplication regionally and nationally.

States planning to develop a new course must notify SLGCP of their intent to do so, but do not need to forward any pre-existing course materials for advance review. States and Urban Areas will be required to submit, through the training section of the ODP website (www.ojp.usdoj.gov/odp/training.htm), the proposed title, description of the course to be developed, the sponsoring jurisdiction, and the intended audience to SLGCP. SLGCP funds can be used to support the costs associated with the course development process, provided that the State or Urban Area abides by SLGCP procedures. However, if the course is disapproved as part of the course review process, no additional SLGCP funds can be dedicated to delivering the course.

States or Urban Areas shall establish a mechanism to ensure that any non-SLGCP courses are in compliance with the following:

- *ODP Emergency Responder Guidelines*
- *ODP Homeland Security Guidelines for Prevention and Deterrence*
- *ODP Strategy for Blended Learning*
- 29 Code of Federal Regulation 1910.120, entitled *Hazardous Waste Operations and Emergency Response*
- 29 Code of Federal Regulation 1910.134, entitled *Respiratory Protection*
- National Fire Protection Association (NFPA) 471, *Recommended Practice for Responding to Hazardous Materials Incidents*
- NFPA 472, *Professional Competence of Responders to Hazardous Materials Incidents*
- NFPA 473, *Standard for Competencies for EMS Personnel Responding to Hazardous Materials Incidents*
- NFPA 1600, *Standard on Disaster/Emergency Management and Business Continuity Programs 2004, specifically Section 5.1.2*

In addition, States and Urban Areas shall follow accepted principles of instructional systems design, employing the Analysis, Design, Development, Implementation, and Evaluation (ADDIE) model or equivalent methodologies. (The ADDIE process is explained in greater depth in the ODP Blended Learning Strategy available on the ODP website at: <http://www.ojp.usdoj.gov/odp/blendedlearning>.) States and Urban Areas shall apply these methodologies to ensure that complete curriculum exists for training funded through SLGCP grant monies. Complete curriculum consists of:

- **Level of Training:** The State or Urban Area will identify the level(s) of training of the course(s) and materials submitted. Each submission must be identified as Awareness, Performance–Defense (OSHA Operations), Performance–Offensive (OSHA Technician), or Planning/Management (OSHA Incident Command) levels. More detailed descriptions of the levels can be found at <http://www.ojp.usdoj.gov/odp/training.htm> or <http://www.osha.gov>
- **Program of Instruction/Syllabus:** The program of instruction or syllabus is an outline or matrix of the course content. It addresses the scope of the training, course learning objectives, duration of the training (broken-down by module, session, or lesson), resource requirements, instructor to student ratio and an evaluation strategy. These items are not all-inclusive, but are the minimum categories that should be addressed.
- **Training Support Package:** The training support package includes all of the materials associated with the delivery of a training course. The following items should be included:
 - **Instructor Guide/Instructor Outline/Instructor Lesson Plans:** The published instructor material that contains course text and special instructor notes that provides the information to deliver the material.
 - **Participant Manual/Guide/Workbook:** The published student material that contains the supporting information in booklet or handout form that the participant has available for reference.
 - **Audio/Visual Support Materials:** Any audio/visual components that are part of any learning module, session, lesson or that supports the overall training being delivered.
 - **Special Support Materials:** Any descriptions of practical exercises, table-top exercises, hands-on exercises or other material that supports learning objectives.
- **Module/Session/Lesson Content:** Training courses should be designed based on a building block approach. Each sub-component in the course should be titled as a module, session, or lesson. Regardless of the title, each module, session, or lesson, should have a Lesson Administration Page that outlines the following:
 - **Scope Statement:** A brief description of the content of the module, session, or lesson.
 - **Terminal Learning Objectives:** An action verb statement that outlines what the participant is expected to learn or be capable of performing at the conclusion of the module, session, or lesson. There should be only one terminal learning objective per module, session, or lesson.
 - **Enabling Learning Objectives:** Enabling learning objectives are the incremental learning objectives that support the terminal learning objective. There should be at least one enabling learning objective per module, session, or lesson. Each enabling learning objective must be a measurable performance statement that enables the participant to demonstrate achievement of the terminal learning objective.
 - **Resource List:** A listing of the resources needed to successfully accomplish the module, session, or lesson.
 - **Instructor to Participant Ratio:** The instructor to participant requirement for successful presentation of the material (e.g., 1:25).

- **Reference List:** A listing of all reference materials used to develop the module, session, or lesson. (This information may also be included as a bibliography.)
- **Practical Exercise Statement:** This describes any exercises associated with the module, session, or lesson.
- **Evaluation Strategy:** This defines the strategy used to evaluate the module, session, or lesson (e.g., written and/or performance test).

8. Conditional Approvals of Non-SLGCP Courses

In FY 2005, no conditional approvals in advance of the SLGCP course review process will be granted for use of SLGCP funds to develop or institutionalize non-SLGCP courses. SLGCP will require States and Urban Areas to adhere to a streamlined course approval process. Courses will either be approved or disapproved following this review process.

Furthermore, conditional approvals granted as part of the FY 2004 process will expire on March 15, 2005. Subsequent to the expiration date, States and Urban Areas may not use SLGCP funding without final approval to support delivery of training they intend to institutionalize which is not developed or delivered by or for a Federal agency. However, deliveries of courses scheduled prior to that date will remain eligible under the conditional approval. States and Urban Areas should note that some courses for which they previously requested approval will no longer be subject to the approval process (e.g., USAR, SWAT, medical trauma, hazardous materials, NIMS, ICS, and Federal courses related to CBRNE terrorism).

SLGCP will conduct periodic, randomized reviews of State and Urban Area training funded through SLGCP monies. These reviews may include requests for all course materials and physical observation of or participation in the funded training. If these reviews determine that courses are outside the scope of this guidance, grantees will be asked to repay grant funds expended in support of those efforts.