Department of Homeland Security
Office of Inspector General

Efficacy of DHS Grant Programs

 Homeland Security

MAR 2 2 2010

Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the department.

This report addresses the strengths and weaknesses of the Federal Emergency Management Agency's efforts to mitigate duplication or redundancy within the department's various preparedness grant programs. It is based on interviews with employees and officials of relevant agencies and institutions, direct observations, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to our office, and have been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

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Inspector General

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Abbreviations

DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
OIG	Office of Inspector General

OIG

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Executive Summary

In FY 2008, the Federal Emergency Management Agency awarded more than $3 billion to state and local governments; territories; tribal governments; and private, public, profit, and nonprofit organizations through preparedness grants and other financial assistance programs. These grants are intended to enhance preparedness, protection, response, recovery, and mitigation capabilities by funding such items as planning, training, exercises, equipment, and interoperable communications. Our objective was to determine whether the Federal Emergency Management Agency and other components of the Department of Homeland Security have identified and taken steps to mitigate duplication or redundancy within the department's various grant programs.

The Federal Emergency Management Agency can improve the efficacy of the grant application and review process by taking steps to mitigate duplication or redundancy within the agency's various preparedness grant programs. The agency's grant application process risks being ineffective because the agency does not compare and coordinate grant applications across programs to identify and mitigate potential duplications. Additionally, grant application processes are not efficient, requiring the Federal Emergency Management Agency and state and local grant administrators to expend time and resources fulfilling redundant requirements for the numerous grant programs.

The report contains three recommendations to the Federal Emergency Management Agency that, when implemented, should improve both the effectiveness and the efficiency of the agency's preparedness grant programs. In its comments on a draft of this report, the Federal Emergency Management Agency concurred with the recommendations and outlined plans and actions to improve the efficacy of these grant programs. We addressed technical comments the agency provided in its comments on the report, as appropriate. A copy of the comments in their entirety is in Appendix B.

Background

The Federal Emergency Management Agency (FEMA) coordinates the federal government's role in preparing for, preventing, mitigating the effects of, responding to, and recovering from all natural or manmade domestic disasters, including acts of terror. Following the September 11, 2001 attacks, federal preparedness guidance and financial assistance evolved and expanded. The President signed Homeland Security Presidential Directive 8, *National Preparedness*, December 17, 2003, to establish policies strengthening the preparedness of the United States. This directive required a national all-hazards preparedness goal, established mechanisms for improved delivery of federal preparedness assistance to state and local governments, and outlined actions to strengthen preparedness capabilities of federal, state, and local entities.

Congress also increased its attention on national preparedness and homeland security by passing legislation to authorize modified or additional preparedness initiatives and assistance programs. Subsequently, Department of Homeland Security (DHS) grant programs implemented numerous and sometimes competing objectives addressed in various post-9/11 laws, strategies, plans, and directives.

In FY 2008, FEMA awarded more than $3 billion to state and local governments; territories; tribal governments; and private, public, profit, and nonprofit organizations through preparedness grants and other financial assistance programs (referred to collectively as grants). DHS preparedness grants are intended to enhance preparedness, protection, response, recovery, and mitigation capabilities throughout the Nation by funding such items as planning, training, exercises, equipment, interoperable communications, and personnel costs.

Within FEMA, the Grant Programs Directorate is responsible for business operations, training, policy, and oversight of all FEMA grants. This new directorate was created on April 1, 2007, in response to the *Post-Katrina Emergency Management Reform Act of 2006*, to consolidate the operations of all FEMA grants under a single organization. The Grant Programs Directorate was formed from three legacy organizations:

- FEMA Grants Management Branch,
- DHS Office of Grants and Training – Office of Grant Operations, and
- DHS Office of Grants and Training – Preparedness Programs Division.

The *Post-Katrina Emergency Management Reform Act of 2006* consolidated not only grant operations, but also preparedness grants that previously had program responsibility residing in various DHS organizations.

The Grant Programs Directorate reviews, negotiates, awards, and manages FEMA's preparedness grant portfolio; provides subject matter expertise in response to regional office and stakeholder inquiries; develops grant guidance and formulates risk methodology to support grant allocations; and analyzes investments. This Directorate also receives subject matter expertise through collaboration with the National Preparedness Directorate and U.S. Fire Administration within FEMA, and other DHS partners such as the U.S. Coast Guard, Transportation Security Administration, Office of Infrastructure Protection, and Office of Emergency Communications.

Our review focused on 13 preparedness grant programs shown in Table 1. These 13 programs provide funding for a variety of items, including planning, training, exercises, and equipment.
We focused our review on planning activities and interoperable communications equipment because they were allowable costs in multiple grant programs. For additional details on our purpose, scope, and methodology, see Appendix A. For a description of the 13 grant programs' objectives, see Appendix C.

Table 1. Grant Program's Allowable Funding For Selected Activities

Grant Program	Funding Activity	
	Planning	Interoperable Communications
Homeland Security Grant Program		
State Homeland Security Program	✓	✓
Urban Areas Security Initiative	✓	✓
Citizen Corps Program	✓	✓
Metropolitan Medical Response System	✓	✓
Assistance to Firefighters Grant Program		✓
Buffer Zone Protection Program	✓	✓
Commercial Equipment Direct Assistance Program		✓
Emergency Management Performance Grant Program	✓	✓
Emergency Operations Center Grant Program	✓	✓
Interoperable Emergency Communications Grant Program	✓	
Port Security Grant Program	✓	✓
Regional Catastrophic Preparedness Grant Program	✓	
Transit Security Grant Program	✓	✓

Results of Audit

FEMA's preparedness grant application process does not promote effectiveness and efficiency. The grant application process risks being ineffective because FEMA does not compare and coordinate grant applications across preparedness programs to identify and mitigate potential duplications. Without evaluating grant applications across grant programs, FEMA cannot ascertain whether multiple funding requests are being submitted for similar purposes.

Additionally, FEMA's preparedness grant application processes are not efficient because they require FEMA and the states to expend time and resources fulfilling redundant application and review requirements for the numerous grant programs. Consequently, limited federal and state resources are not being expended in the most beneficial manner.

Preparedness Grant Program Applications Are Not Compared or Coordinated

The preparedness grant application process risks being ineffective because FEMA does not compare and coordinate grant applications across preparedness programs to mitigate potential duplications and redundancy.

Barriers at the legislative, departmental, and state levels impede FEMA's ability to coordinate these programs. Since grant programs may have overlapping goals or activities, FEMA risks funding potentially duplicative or redundant projects.

Legislation Creates Barriers to Coordination

Three types of legislative barriers hinder FEMA's ability to identify and minimize duplication and redundancy within preparedness grants. First, Congress enacts legislation for preparedness grants that have similar goals. Second, Congress appropriates funds on an annual basis for these grants and in most instances, the legislation mandates disparate application and award milestones. Finally, the annual appropriation law may contain congressional earmarks that dedicate funds towards specific grant projects, precluding FEMA from coordinating grant programs.

<u>Multiple Grant Programs Have Similar Legislated Goals</u>

The 13 grant programs we reviewed have similar legislated goals. At a broad level, these programs provide federal assistance to state and local governments, nonprofit organizations, emergency responders, and port and transit authorities to improve homeland security and emergency management capabilities. Specifically, the legislated goals of these grant programs focus on activities to prepare for or respond to acts of terrorism or other disasters.

For example, states may request funding for planning projects through both the Urban Areas Security Initiative and the Regional Catastrophic Preparedness Grant Program. While the goals for both programs are directed at improving preparedness planning in high-risk urban areas, the Regional Catastrophic Preparedness Grant Program is focused on all-hazards planning, while the Urban Areas Security Initiative is focused on responding to acts of terrorism.

In addition to the Urban Areas Security Initiative, other grant programs have legislated goals to prepare for, prevent, or respond to acts of terrorism. Specifically, state and local governments as well as port and transit authorities can request funds for, and respond to terrorist acts, through the State Homeland Security Program, the Port Security Grant Program, and the Transit Security Grant Program.

<u>Disparate Milestones Are Legislatively Established</u>

Legislation also mandates grant application processing and award milestones; however, not all grants are set on the same schedule. The *2008 Consolidated Appropriations Act*, Public Law 110-161, December 26, 2007, established two sets of milestones for 8 of the 13 grant programs we reviewed. The legislation required grant applicants to submit applications for three of the grants in March 2008, with awards due in May 2008, while applications for five of the grants were due in April 2008, with awards in July 2008. With grant review periods and award dates more than 2 months apart, FEMA may not have sufficient time to compare the numerous applications submitted by each state for similar or related projects to prevent duplication. While we are not advocating that all applications be due on the same date, we are identifying the disparate schedules as a potential barrier to FEMA's ability to coordinate related projects.

To illustrate, Figure 1 reflects the different legislated milestone requirements for the Urban Area Security Initiative and the Transit Security Grant Program. Both of these programs may be used for costs to develop and implement homeland security support programs, and adopt ongoing DHS national initiatives such as enhancing preventive radiological and nuclear detection programs. As shown in the figure below, FEMA must make award decisions for the Transit Security Grant Program before completing its review of Urban Areas Security Initiative applications, inhibiting coordination of potentially related projects.

Figure 1. Legislatively Established Grant Milestones for Two Programs
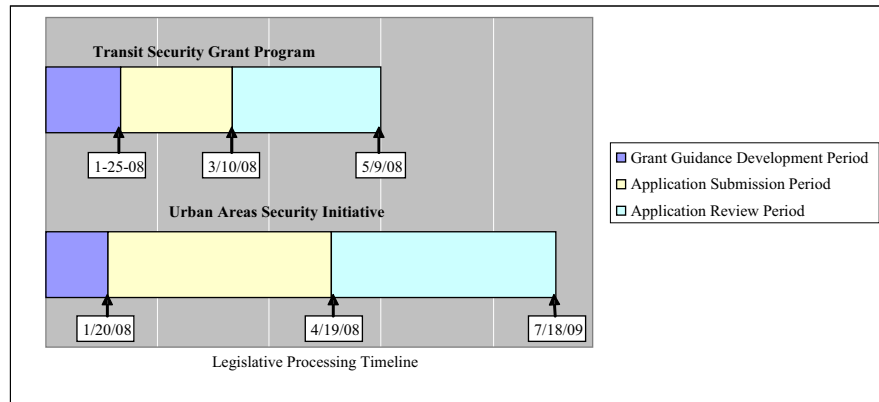
As another example, the State Homeland Security Program and the Buffer Zone Protection Program both fund interoperable communications equipment. However, legislation requirements

provide for different review periods and grant award dates that are more than 2 months apart. The State Homeland Security Program has the same milestones as the Urban Areas Security Initiative while the Buffer Zone Protection Program's dates align with the Transit Security Grant Program.

<u>Congress Earmarks Funds for Specific Purposes</u>

Annual appropriation law may contain congressional earmarks that fund specific grant projects. These earmarks limit FEMA's ability to ensure federal assistance is being provided to fund grant recipients' most urgent homeland security and emergency management needs and priorities. They also inhibit FEMA's ability for corrective action on potentially duplicative investments for grant recipients who received grants through normal risk-based application processes for purposes similar to the earmarked funds.

> **Earmarks:** Funds provided by Congress for projects, programs, or grants where the purported congressional direction circumvents otherwise applicable merit-based or competitive allocation processes, or specifies the location or recipient.
>
> *Source: Office of Management and Budget*

For example, one county in Washington applied for the Emergency Operations Center Grant in FY 2008. The state ranked the application as a low priority and the project did not receive grant funding. However, the county received an earmark for $1 million in the following year's FY 2009 Emergency Operations Center Grant appropriations, although it may not have been the state's highest priority. While earmarks do not directly prohibit FEMA from comparing similar projects funded by different grants, they do inhibit FEMA's ability to take action if a lower priority project with earmarked funds overlaps with another higher priority project funded by a grant that uses a risk-based allocation methodology.

Departmental Processes and Organizational Structures Present Barriers to Coordination

In addition to legislative barriers, FEMA faces department-level challenges that impede its ability to coordinate grant applications across the many programs. Departmental barriers include:
- Interpreting legislation,
- Developing grant guidance,
- Requiring investment justification details,
- Reviewing applications, and

- Coordinating with subject matter experts located in separate program offices.

Grant-Related Legislation Requires Interpretation

FEMA, or its predecessor organizations, created a barrier to coordination in establishing separate stand-alone grant programs to accomplish congressional objectives. Typically, once Congress authorizes a grant to fund an emerging homeland security or emergency management need, FEMA develops a new and separate grant program. For example, Public Law 110-53, *Implementing Recommendations from 9/11 Commission Act*, August 3, 2007, directed FEMA to make grants to states for equipping, upgrading, and constructing emergency operations centers. While the legislation did not direct FEMA to establish a separate program, FEMA interpreted the legislation as such. FEMA's development of separate grant programs promotes fragmentation and complicates coordination at both the federal and state level.

Grant Guidance Is Developed for Individual Programs

Creating individual guidance for each grant program deters coordination because the individual guidance documents establish a separate identity for each program and each grant application will be tailored specifically to the guidance. Grant guidance establishes the individuality and details the scope of a grant program. The substance of individual grant guidance includes identifying funding priorities, describing the application and review process, providing the investment justification template, and other year-to-year changes.

The FEMA Grant Programs Directorate has the main responsibility for issuing grant guidance, yet the directorate coordinates with individual program offices to develop the substance of the grant guidance for each individual grant program. The grant program offices can be within or outside of the Grant Programs Directorate. With the exception of the Homeland Security Grant Program, which combines grant guidance for four interrelated grant programs into one guidance document, individual grant guidance results in a deterrence to coordination because of the number of organizations involved.

Applications and Investment Justifications Request Different Levels of Detail

Typically, the level of detail in grant applications and investment justifications is not sufficient for FEMA to identify potential duplication and redundancy. Investment justifications are a part of a grant application and provide a template for the applicant to describe the proposed project and demonstrate how it addresses deficiencies in current capabilities. However, the level of detail on each project makes it difficult to identify whether states are applying for similar projects under another grant program. The investment justification template for the State Homeland Security Program, for instance, does not provide grant applicants the ability to provide specific details on their proposed projects. The investment template covers topics including critical infrastructure, preparedness planning, and interoperable communications. It also requests a high-level purpose statement, funding plan, and outcomes.

As an example, one state submitted an investment justification under the State Homeland Security Program to provide exercises to emergency responders to reinforce the principles of the National Response Framework and the National Incident Management System. Similarly, the state requested funding through the Emergency Management Performance Grant to develop, design, and conduct exercises focusing on enhancing regional collaboration and coordination and to reinforce the implementation of the National Incident Management System. Both investments address exercises related to the National Incident Management System, but without additional details, FEMA cannot readily identify whether these projects overlap.

Applications Are Reviewed At the Department Level Without Considering Other Grant Programs

FEMA's ability to determine whether the proposed grant application investments contain duplicative or redundant requests is impeded when grant applications and investment justifications are reviewed one program at a time. After a grant application is submitted, a review panel evaluates applications and proposed investments. While the panel compares the proposed investments to the grant guidance for that program, the panel does not compare proposals against applications for other grant programs submitted by the same grantee.

With the availability of funds from numerous individual preparedness grant programs for similar purposes, applicants may apply for multiple grant programs for the same items to maximize their chances to fully fund a project. Eleven of the 13 programs reviewed allow applicants to purchase interoperable communications equipment, such as radios. Therefore, it is possible for a single organization within a state to receive funding from multiple grant programs for similar items. As one example, it is possible for a law enforcement organization to build a cache of radios through multiple grant programs, as shown in Figure 2 below. As these four programs undergo different review processes, FEMA cannot readily identify whether funds requested are for similar or overlapping projects.

Figure 2. Use of Multiple Grant Programs for Similar Equipment Requests
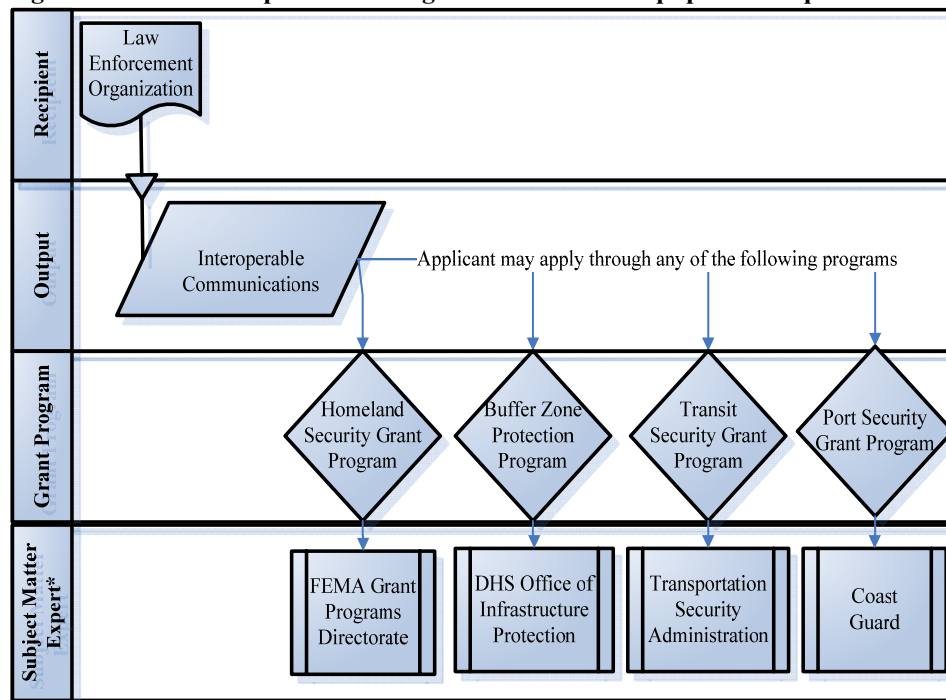
* Subject matter experts perform the technical review of investment proposals. FEMA also has a role in the application process for all four grant programs.

FEMA has taken initial steps to coordinate application and investment justification reviews for four individual grant programs. The Homeland Security Grant Program is comprised of four interconnected grant programs: (1) the State Homeland Security Program, (2) Urban Areas Security Initiative, (3) Metropolitan Medical Response System, and (4) Citizen Corps Program. During the review process, state and local peer reviewers evaluate and score applications and investment justifications for all four of the individual grant programs in a single application submission and

review process. However, while state and local peer reviewers have the capability to perform an internal comparison of grant programs under the Homeland Security Grant Program, they do not have access to applications and investment proposals submitted in response to other grant programs with similar purposes or allowable activities.

<u>Separate Program Office Responsibilities Hamper Coordination</u>

Grant program management split among several offices creates organization barriers to coordination. Although the Grant Programs Directorate is responsible for managing DHS preparedness grants, program-specific management is split among different directorates within DHS. FEMA has the lead for managing the review and approval processes and coordinating grant guidance, while separate organizations within DHS identify the funding priorities, provide guidance input, and participate in the review process. While each grant program has a guidance document defining the application and review process for the individual program, FEMA does not have an overarching policy to outline the roles and responsibilities for coordinating applications across grant programs.

As shown in Table 2, responsibility for the 13 grant programs we reviewed is split among five different organizations.

Table 2. Program Responsibility for Grant Programs

FEMA Grant Programs Directorate	**FEMA National Preparedness Directorate**
• Homeland Security Grant Program – State Homeland Security Program – Urban Areas Security Initiative – Citizen Corps Program – Metropolitan Medical Reserve System • Assistance to Firefighters Grant Program • Emergency Management Performance Grant Program • Emergency Operations Center Grant Program • Interoperable Emergency Communications Grant Program	• Commercial Equipment Direct Assistance Program • Regional Catastrophic Preparedness Grant Program **Transportation Security Administration** • Transit Security Grant Program **U.S. Coast Guard** • Port Security Grant Program **DHS Office of Infrastructure Protection** • Buffer Zone Protection Program

When subject matter experts, who define funding priorities and review investment justifications, reside outside of FEMA, the

agency's ability to coordinate across grant programs is impeded. For example, the Buffer Zone Protection Program is not coordinated with other grant programs at the department level. This program provides funding to secure predesignated critical infrastructure sites, which are preselected by the DHS Office of Infrastructure Protection. Once DHS selects the sites, local officials work with site owners to develop security plans and identify equipment needed to implement the plan. Because FEMA does not have a process for ensuring applications are coordinated across grant programs, the Office of Infrastructure Protection is unable to validate with FEMA whether the applicant had requested similar equipment items under other grant programs.

FEMA also encounters barriers to coordination when different organizations within FEMA are responsible for managing preparedness grants. The Grant Programs Directorate has programmatic responsibility for 8 of the 13 programs we reviewed, while the National Preparedness Directorate has programmatic responsibility for 2 grant programs. Because these 10 grant programs have overlapping funding activities and have different organizations participating in the investment justification review and approval process, FEMA cannot readily identify redundancy in funding requests across the different grant programs. While FEMA relies on the subject matter expertise that these organizations provide, it cannot easily identify duplications in its grant programs without an overarching policy outlining roles and responsibilities for coordinating applications across grant programs and across the different organizations.

State-level Barriers Impede Coordination

FEMA encounters barriers at the state level that impede its ability to compare and coordinate grant applications and investments across preparedness programs. States do not have an overall grant strategy that identifies specific projects and their funding sources. Additionally, there is not one organization within the state that has visibility over all state entities that receive DHS financial assistance.

Not All States Have Overall Grant Strategies

The three states we visited did not have overall, comprehensive grant strategies. The states had various preparedness strategies or plans that address target capabilities and identify critical goals, objectives, and implementation steps. However, the plans did not

specifically address how the states are using funds from the multiple DHS grants to improve homeland security preparedness. A more comprehensive plan could provide states a tool to promote coordination across the different grant programs which are now planned and accounted for separately.

State-level Visibility Over All Grant Programs Is Not Centralized

FEMA cannot rely on the states to coordinate all preparedness grant applications because grants are awarded to multiple organizations within the state. At the three states we visited, none of the states had an organization with visibility across all preparedness grant programs. Some grants are awarded through state administrative agencies while others bypass the state administrative agency and go directly to recipients such as port authorities, local fire departments, and first responders.

For grant programs where the state administrative agency is involved, the agency may not have programmatic responsibility over the program. In this case, the state administrative agency would not be reviewing grant projects from the same perspective as a subject matter expert or be able to readily identify duplication or redundancy. The prerogative of each state to determine its own organizational structure may or may not coincide with the corresponding federal grant program responsibility.

> **Programmatic vs. Financial Responsibility**
>
> Programmatic Responsibility: Responsibility to ensure that programs and projects are implemented consistent with the grantee's approved plans and according to the rules and regulations of the awarding office. It also includes the ability to identify problems that may impede effectiveness of the federally funded programs or projects and serves to verify program implementation.
>
> Financial Responsibility: Responsibility to measure grantees' compliance with federal policies and regulations.
>
> *Source: FEMA*

For example, at two of the three states visited, subject matter experts outside of the state administrative agency prepared the investment justifications for the Interoperable Emergency Communications Grant Program. The state administrative agency primarily ensured compliance with grant guidance and administrative requirements, but did not have programmatic responsibility for the projects and funding requested.

Additionally, grant funding may be sent directly to an organization outside of the state administrative agency. For example, the Port Security Grant Program funds go directly to a fiduciary agent selected by the port. At two of the three states visited, the fiduciary agency was not the state administrative agency and therefore the state was not aware of projects being funded through this program. Without the state having visibility over all preparedness grants, FEMA cannot rely on states to identify duplication and redundancy across DHS grant programs.

Grant Application Processes Can Become More Efficient

FEMA's grant application processes are not efficient because application requirements, review processes, and timelines vary among the grant programs. These numerous processes and requirements can be burdensome on federal and state resources because this creates redundant work for both federal and state personnel. Therefore, coordinating and streamlining these application processes may help ensure the most efficient use of limited federal and state resources.

Inconsistent or Redundant Grant Application Requirements Preclude Efficient Planning

FEMA issues separate annual guidance to outline the application processes and requirements for each grant program which creates burdensome requirements on both FEMA and grantees as the requirements differ across grant programs. Additionally, the multiple application processes have redundant requirements.

Grant Requirements for Similar Grant Programs Differ Significantly

Requirements in grant guidance vary across programs, regardless of the similarities of the grant program, making it difficult for states to have a streamlined planning process that is consistent across all grant programs. Differences include program priorities and investment justification templates that must be followed.

Priorities. While considerable potential overlap exists in the activities supported by DHS preparedness grant programs, the priorities for these programs may differ. For example, the FY 2008 Urban Areas Security Initiative, Regional Catastrophic Preparedness Grant Program, and Emergency Management Performance Grant Program provide assistance to improve

preparedness planning processes. However, each program focuses on a different priority.

- The Urban Areas Security Initiative provides funds to high-risk urban areas to build an enhanced and sustainable capability to prevent, protect against, respond to, and recover from acts of terrorism.

- The Regional Catastrophic Preparedness Grant Program, which supports improved and expanded regional collaboration for all hazard and catastrophic events, also funds high-risk urban areas but includes surrounding regions as well. Additionally, this program focuses on eight national planning scenarios identified by the federal government as the most urgent for planning purposes among all levels of government.

- The Emergency Management Performance Grant Program also supports state and local all-hazards emergency management programs and encourages applicants to address national planning scenarios in their work plans, but is focused on evacuation planning, logistics and resource management, continuity of operations planning, and recovery planning.

Since each preparedness planning program focuses on a different priority, states have to undertake three separate planning and grant application processes to request funding under each program.

Investment Justification Templates. Grant programs have different investment justification templates as part of the application process. This requires applicants to prepare investment justifications or documents with unique information for each program regardless of the similarities of the proposed funding activities. These varied templates and program documents may provide consistency for panels reviewing proposed project proposals for the individual grant programs, but present an administrative burden for grant applicants who must prepare similar information in different formats.

For example, the Buffer Zone Protection Program requires applicants to prepare two unique documents not required for other grant programs. First, individual jurisdictions responsible for the buffer zone are required to submit a Buffer Zone Plan to assist them in identifying preventive and protective measures necessary

to protect a critical infrastructure and key resource site, mitigate vulnerabilities, or close capability gaps. Next, the jurisdictions complete a Vulnerability Reduction Purchasing Plan, a spending plan that includes the planning activities and equipment necessary to implement the Buffer Zone Plan. As these documents are unique and integral to the program, they may present an administrative burden to state grant administrators in fulfilling these specialized requirements.

<u>Grant Applications for Similar Programs Incorporate Redundant Requirements</u>

Grant applicants must perform redundant work to apply for DHS preparedness grants, which is burdensome and time consuming. The use of the website grants.gov has streamlined the application process, but it still requires applicants to prepare and submit redundant information if an applicant applies for multiple grants.

FEMA's grant application process required each State Administrative Agency, the designated applicant for 10 of the 13 grant programs reviewed, to complete an online grant application seven times for the 10 grant programs. Submitting these similar documents multiple times may increase the State Administrative Agency's opportunities for errors on these forms. The process for the seven grant programs included similar application, financial, and administrative compliance requirements, as listed in Table 3.

Table 3. Grant Program Filing Requirements

<u>Application Requirements</u>
- Application for Federal Assistance (SF 424)
- Investment Justification or Plan
- Disclosure of Lobby Activities (SF LLL)
- Budget Information
  - Budget Information – Non-construction Programs (SF 424A)
  - Budget Information – Construction Programs (SF 424C)

<u>Standard Financial Requirements</u>
- Non-supplanting Certification
- Assurances
  - Assurances – Non-construction Programs (SF 424B)
  - Assurances – Construction Programs (SF 424D)
- Certification Regarding Debarment, Suspension, and Other Responsibility Matters and Drug-Free Workplace Requirement

<u>Administrative Compliance Requirements</u>
- Federal Civil Rights Laws and Regulations
- Services to Limited English Proficient Persons
- Integrating Individuals with Disabilities into Emergency Planning
- National Energy Conservation Policy and Energy Policy Acts
- Environmental and Historical Preservation

FEMA also requires State Administrative Agencies to use two online systems to complete and file investment justifications for the Homeland Security Grant Program. First, the State Administrative Agency must complete the State Homeland Security Program and Urban Areas Security Initiative investment justifications through the department's Grant Reporting Tool. Upon completion of the investment justifications, the State Administrative Agency must submit the official copy of its final investment justification through www.grants.gov with the grant application. While these online tools helped to streamline the application processes, they include an inefficient duplication of effort for both federal and state grant administrators.

Review Panels Differ Across Grant Programs

Grant programs have separate review processes to evaluate funding requests for each grant program, which requires FEMA to convene multiple review panels to evaluate applications and investment justifications. For all programs, FEMA verifies the applicant's compliance with administrative and eligibility criteria identified in each grant program's application kit. FEMA then sends the eligible applications through an investment justification review process to evaluate the merits of proposed investments against grant guidance criteria. However, FEMA uses various types of

reviews to evaluate proposed investments. The type of review and participants of the review panel are based on the grant program. For the 13 grant programs we reviewed, FEMA employed 6 different review processes, composed of different personnel such as federal, state, and local government personnel; emergency responders; and members of national associations, as shown in Table 4.

> **Best Practice**
>
> In 2005, FEMA incorporated the application process of four complementary grant programs into the Homeland Security Grant Program:
>
> > State Homeland Security Program
> >
> > Urban Areas Security Initiative
> >
> > Citizen Corps Program
> >
> > Metropolitan Medical Response System
>
> While the four grant programs retained their distinct and separate identities, the Homeland Security Grant Program provides a single application kit and program guidance to facilitate coordination and management of state and local homeland security funding. This also helps ensure that available funding is leveraged for maximum impact.
>
> *Source: FEMA*

Table 4. Grant Program Review Methodologies

1. FEMA Review – FEMA headquarters components and/or regional offices review investments and make award determinations. (Emergency Management Performance Grant Program)

2. DHS Review – DHS components outside FEMA, such as the Office of Infrastructure Protection review proposed investments. (Buffer Zone Protection Program Grant)

3. Peer Review – A panel of state and local representatives from across the Nation, such as subject matter experts with experience in fire and emergency response, review and score proposed investments. (Homeland Security Grant Program, Assistance to Firefighters Grants)

4. Federal Review – A panel of subject matter experts from across DHS, including components within FEMA and outside FEMA such as the DHS Office of Emergency Communications, review proposed investments. (Interoperable Emergency Communications Grant Program)

5. National Review – A panel of subject matter experts from across DHS, including FEMA, non-DHS federal components, or national associations, review proposed investments. (Port Security Grant Program)

6. Subject Matter Expert Review – National subject matter experts with experience in law enforcement and emergency response review and score proposed investments. (Commercial Equipment Direct Assistance Program)

These numerous panels create additional work for FEMA to request review panel members from federal, state, and local organizations, depending on the grant program. FEMA must also train the numerous panels, provide review materials, oversee the panels, and compile panel results. Consolidating panels where grant programs have similar purposes or activities would provide a more efficient use of federal, state, and local resources.

Existing Grant Application Timelines Are Not Arranged Optimally

Grant timelines do not promote the most efficient application preparation and review because they are not arranged in the most optimal sequence. In many cases, the timelines are legislatively established and do not allow states the opportunity to logically develop investment justifications that address overarching needs or define target capabilities while simultaneously focusing on more narrowly focused programs. For the 13 FY 2008 grant programs we reviewed, application timelines varied from March 1 to July 28, 2008. Although the scopes of these programs may overlap, we did not identify a consistent pattern in the current sequence that would allow states to develop investment justifications for similar programs or related projects in a logical and efficient order.

For example, law enforcement organizations that provide transit security may receive funding through the Transit Security Grant Program. These same organizations may also receive funding for law enforcement terrorism prevention–oriented planning, training, exercise, and equipment activities through both the State Homeland Security Program and the Urban Areas Security Initiative. While we have not defined the most optimal sequence for grant programs, an organized sequence would increase efficiency at the federal level by allowing grant reviewers to use the outcome from various panels as they review their investments and also by reducing the time that states may spend developing investment justifications. This would also provide a better review at the state level to ensure that redundant projects are not duplicated across grant programs.

Conclusion

DHS preparedness grants are critical to help the country prepare for, respond to, and recover from disasters. Barriers at the legislative, departmental, and state levels preclude the agency from coordinating grant applications to avoid potential duplication and redundancy. Without this coordination, FEMA risks funding duplicative or redundant projects and cannot readily ascertain whether limited federal funds are awarded to grant recipients' most urgent homeland security and emergency management needs and priorities.

The numerous grant application and review processes can be burdensome on federal and state resources because of the redundant work imposed on

both federal and state personnel. As a result, limited federal and state resources are being expended inefficiently.

We recognize that legislated requirements can complicate the application and review of federal assistance programs. However, FEMA must identify alternate ways to improve its grant application and review processes operating within currently legislated requirements or work with Congress to modify the processes to ensure the most efficient and effective use of limited federal resources.

Recommendations

We recommend that the Administrator, Federal Emergency Management Agency:

Recommendation #1: Identify preparedness grant programs that may overlap or duplicate other programs and ensure the application and review processes for these programs are coordinated to mitigate potential duplication and redundancy.

Recommendation #2: Document specific agency roles and responsibilities for cross-program coordination of grant application and review processes and ensure internal DHS coordination is in place. This may include establishing memorandums of agreement if roles are outside the Federal Emergency Management Agency.

Recommendation #3: Work with Congress and state grant administrators to identify opportunities and implement actions to streamline and standardize multiple preparedness grant program application processes.

Management Comments and OIG Analysis

The Director of FEMA's Office of Policy and Program Analysis provided written comments on a draft of this report. FEMA concurred with our recommendations, but commented that the manner in which each program is implemented is driven by the Congress. As long as Congress authorizes and appropriates programs for singular purposes to specific constituencies, FEMA will carry out the programs as mandated.

FEMA's response also incorporated technical comments from the DHS Office of Infrastructure Protection, which shares responsibility with FEMA for the Buffer Zone Protection Program. We considered these comments when preparing the final report

and, where appropriate, modified the report. We have incorporated a copy of the comments in their entirety in Appendix B.

Management Comments to Recommendation #1. FEMA concurred with the recommendation, and has already undertaken an effort to review existing grant programs and identify ways to minimize report and application burdens. Additionally, FEMA is working with the department to consolidate grant programs where activities are allowable under multiple grant programs. FEMA recognizes that legislation may hinder its ability to eliminate grant program overlaps, specifically when annual appropriation law provides separate and distinct purposes, funding, and administrative limitations.

OIG Analysis: This recommendation is resolved, but will remain open until we have reviewed the results of the DHS and FEMA analyses on consolidating overlapping grant programs and minimizing application burdens.

Management Comments to Recommendation #2. FEMA concurred with the recommendation and, along with the Office of Infrastructure Protection, has developed a draft memorandum of agreement identifying specific roles and responsibilities for coordination of the Buffer Zone Protection Program. FEMA is in the process of establishing memorandums of agreement with other components. Additionally, FEMA acknowledged that it must use multiple disparate systems to manage grant funds. It believes that future implementation of the Non Disaster Grants System may mitigate some issues identified in our report.

OIG Analysis: This recommendation is resolved, but will remain open until FEMA finalizes and implements its memorandums of agreement with the different components.

Management Comments to Recommendation #3. FEMA concurred with the recommendation, and stated it has robust interaction with Congress, the Office of Management and Budget, and numerous stakeholder communities. FEMA is also establishing a Preparedness Task Force, comprised of state, tribal, local, and private sector experts. The Task Force will be charged with evaluating FEMA's preparedness efforts, including the structure and requirements of its grant programs. FEMA expects the task force will provide its recommendations for improving these and other activities by the end of FY 2010.

OIG Analysis: This recommendation is resolved, but will remain open until the task force completes its review and FEMA analyzes its recommendations.

The purpose of our audit was to determine whether FEMA and other components of the department have identified and taken steps to mitigate duplication or redundancy within the department's various grant programs that impede the ability of recipients to apply grant funds toward their most urgent homeland security and emergency management needs and priorities.

We met with DHS Grant Policy and Oversight and FEMA officials responsible for management and oversight of DHS preparedness grants: Grant Programs Directorate, National Preparedness Directorate, and U.S. Fire Administration. We also conducted interviews with officials from FEMA Region III, Transportation Security Administration, and U.S. Coast Guard.

We evaluated internal controls that were pertinent to the audit objective. Specifically, we discussed FEMA and DHS financial and programmatic responsibilities, including reviewing, negotiating, awarding, and managing FEMA's preparedness grant portfolio; providing subject matter expertise in response to regional office and stakeholder inquiries; developing grant guidance and formulating risk methodology to support grant allocations; and conducting investment analysis.

During our review, we reviewed recent Government Accountability Office and OIG reports and testimony to identify prior findings and recommendations. We researched and reviewed pertinent legislation and FY 2006 through FY 2009 grant guidance, with a focus on FY 2008 DHS grant program guidance.

We identified a universe of 43 DHS preparedness grant programs and developed a relationship matrix to identify allowable funding activity outputs (e.g., planning, interoperable communication, equipment) associated with each program. We selected two funding outputs, planning and interoperable communications, and further reviewed the guidance for the 13 grant programs that funded one or both of those outputs to determine whether complementary or duplicative relationships exist among the multiple grant programs.

We visited three states to understand the processes used to coordinate grant program activities at the state level to mitigate duplication among different DHS grant programs with similar funding activities. We selected the states based on their high level of FY 2008 funding:

- Commonwealth of Pennsylvania: $126 million
- State of Washington: $92 million
- Commonwealth of Virginia: $69 million

At the three states, we reviewed investment justifications and project proposals submitted in response to DHS preparedness grants. We met with homeland security coordinators, grant administrators, peer reviewers, and subject matter experts to gain an understanding of roles, responsibilities, and state application requirements. We also interviewed other relevant personnel to gain an understanding of the processes used to coordinate grant program activities at the state level.

We conducted our audit from March to September 2009 at FEMA headquarters in Washington, DC; FEMA Region III in Philadelphia, PA; Transportation Security Administration in Arlington, VA; and state administrative agencies, fiduciary agents, and other state offices in Richmond, VA; Harrisburg, PA; and Camp Murray and Tacoma, WA. We performed our work according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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FEB 1 9 2010

MEMORANDUM FOR: Anne L. Richards
Assistant Inspector General for Audits
Office of Inspector General

FROM: David J. Kaufman *Robt a. Zane, для*
Director
Office of Policy and Program Analysis

SUBJECT: Comments on OIG Draft Report, *Efficacy of DHS Grant Programs*

Thank you for the opportunity to review and comment on the Office of Inspector General's (OIG's) subject draft audit report. As the Federal Emergency Management Agency (FEMA) works toward refining its programs, the OIG's independent analysis of program performance greatly benefits our ability to continuously improve our activities. Technical comments have been provided under separate cover.

In general, it appears there is an assumption that all the preparedness grants have a similar purpose. They may have a similar goal, enhancing preparedness, but the purpose of each grant program is directed toward different sectors within the States (i.e. transit agencies, non-profit entities, fire departments) and their Homeland Security/emergency management efforts.

The degree to which each grant program and the manner in which it is implemented is driven by Congressional direction does not appear to be completely understood nor evident in the draft report. Starting with the instruction and mandates of the annual Appropriations Bill and continuing through the drafting and ultimate release of Grant Guidance, the work of the Grant Programs Directorate is to carry out the direction of the Congress. Extensive vetting of program guidance is conducted with FEMA and Department of Homeland Security (DHS) partners, the Office of Management and Budget (OMB), and Congress. Additionally, we engage in significant efforts with constituent groups to obtain feedback and recommendations on implementation of programs. Each program has nuances that must be addressed throughout the process.

As long as Congress authorizes and appropriates programs for singular purposes to specific constituencies, FEMA is required to carry out those programs as mandated.

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Appendix B
Management Comments to the Draft Report

The following includes comments that were provided by the DHS Office of Infrastructure Protection (IP), which shares responsibility with FEMA for the execution of the Buffer Zone Protection Program, and is organized by the draft report's titled sections:

- *Table 1: Grant Program's Allowable Funding Activities*
  This table misrepresents the allowable funding activities of the Buffer Zone Protection Program (BZPP) and other grant programs by focusing on only two aspects (planning and interoperable communications) that are common among the grants. The table is not an accurate depiction of the allowable funding activities of the BZPP or other grant programs. This provides an incomplete picture of the efficacy of the DHS Grant Programs, which is the purpose of the report. If the table included all of the allowable funding activities for each grant program, it would illustrate the many key differences among the grant programs, reflecting the specific role of each. For example, the BZPP allows local jurisdictions to purchase equipment for the purposes of protection and prevention, not only planning and interoperable communications.

- *Applications are Reviewed Without Considering Other Grant Programs*
  FEMA and IP have taken steps to avoid duplication between the BZPP and other grant programs. The BZPP requires that the State or local jurisdiction identify in the Buffer Zone Plan (BZP) and Vulnerability Reduction Purchasing Plan (VRPP) other funding sources that are being leveraged to address recommended enhancements; how the requested purchases support the achievement of goals and objectives from State/Urban Area homeland security strategies; how the equipment requests support the National Priorities, specifically the implementation of the National Infrastructure Protection Plan and Statewide critical infrastructure protection programs; and the DHS Target Capabilities the proposed purchases support. To ensure grant programs are not funding the same activities or purchases, the responsible jurisdiction is also required to coordinate with any Urban Area Working Group, Regional Transit Security Working Group, or Area Maritime Security Committee in their area. Additionally, the BZPP funds are targeted to the first responders responsible for the protection of these specific Critical Infrastructure and Key Resource (CIKR) assets, typically a local law enforcement agency or department. No other grant programs specifically target the unique vulnerabilities of individual CIKR assets and the CIKR protection resource needs of first responders responsible for protecting them.

- *Figure 2: Use of Multiple Grant Programs for Similar Equipment Requests*
  While all four of the grant programs cited in Figure 2 allow grant funds to be used to purchase equipment from FEMA's Authorized Equipment List, the categories of equipment authorized for purchase through each program differ. Without this information, this Figure cannot provide a complete picture of the efficacy of the DHS Grant Programs, which is the purpose of the report. BZPP purchases are limited to those needed by State and local first responders to mitigate the vulnerabilities and equipment and resource gaps identified during the development of BZPs and reflected in VRPPs, which identify the specific equipment needed by first responders to effectively protect

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CIKR assets. This differs from allowable communications purchases made under other larger grant programs, such as the State Homeland Security Grant Program, which can be used to purchase Statewide interoperability systems.

- *Separate Program Office Responsibilities Hamper Coordination*
  IP disagrees strongly with the draft report's statements on page 12 that, "...the Buffer Zone Protection Program is not coordinated with other programs...the Office of Infrastructure Protection approves the requested equipment without coordinating with FEMA for duplication with other grant programs." The coordination and collaboration between FEMA and IP is a strong and crucial component of this program. The coordination of the BZPP between IP and FEMA is described in a draft Memorandum of Agreement (MOA) currently under review. With regard to grant duplication, as previously discussed, in an effort to specifically combat duplication the BZPP requires that the State or local jurisdiction identify in the BZP and VRPP other funding sources that are being leveraged to address recommended enhancements; how the requested purchases support the achievement of goals and objectives from State/Urban Area homeland security strategies; how the equipment requests support the National Priorities, specifically the implementation of the National Infrastructure Protection Plan and Statewide critical infrastructure protection programs; and the DHS Target Capabilities the proposed purchases support. To ensure grant programs are not funding the same activities or purchases the responsible jurisdiction is also required to coordinate with any Urban Area Working Group, Regional Transit Security Working Group, or Area Maritime Security Committee in their area.

- *Investment Justification Templates*
  Most grants use a standard Investment Justification (IJ) Template which is a four page document requiring the applicant to justify the award. For example, the IJ for the State Homeland Security Program is little more than a checklist of previous funding with a brief strategy narrative (2,500 characters max).

  The BZPP application requires applicants to create a Buffer Zone Plan (BZP), which is much more than a typical grant application. The BZP is a strategic document developed by local law enforcement and jurisdictions with the support of DHS that assists State and local law enforcement and other first responders in developing site-specific preventive and protective measures that make it more difficult to successfully target and attack critical infrastructure sites. It requires an on-site visit of the facility by local law enforcement, collaborative planning meetings between local law enforcement and the facility owner/operator, and may include specialized evaluations (e.g., vulnerability assessments, blast modeling, assault planning) by DHS/IP CIKR protection subject matter experts. Development of the BZP is an integral part of the BZPP, as its development promotes and enhances coordination and collaboration between CIKR facility owners/operators and the first responders responsible for protecting or responding to the site, ensures that funds are applied directly to actual gaps in site prevention and

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protection capabilities of first responders, and serves as a formal planning document for both the facility and first responders.

While understanding that the BZP and VRPP process may be more involved and time intensive than a standard IJ, the collaborative security planning that goes into the development of the two documents is perhaps the most important aspect of the Program, and provides DHS with the best visibility into the effect of the grants by ensuring they address gaps identified during the BZP development process. The BZPs for each facility are based on detailed assessments of the facility and a gap analysis of the local law enforcement's capabilities. This assessment information leads the local law enforcement to identify specific equipment or planning needed to fill those prevention and protection capability gaps. No other grant programs have a comparable means of accurately identifying and specifically targeting the unique vulnerabilities of individual CIKR assets and the CIKR protection resource needs of first responders responsible for protecting them.

With respect to the draft report's three recommendations, FEMA concurs with all of the recommendations. Specific comments on the recommendations are provided in our responses below:

Recommendation 1: Identify preparedness grant programs that may overlap or duplicate other programs and ensure the application and review processes for these programs are coordinated to mitigate potential duplication and redundancy.

Response: FEMA concurs with this recommendation. FEMA has already undertaken an effort to review existing grant programs and to look at ways to minimize report and application burdens. In addition, FEMA is working closely with the Department to consolidate grant programs where activities are allowable under multiple grants. However, some grant programs are identified by name in annual Appropriations Acts, and FEMA has understood that Congress attaches separate and distinct purposes for each, separate funding streams, and administrative limitations (i.e. cost-share requirements, one year money vs. no year money, etc).

Also, the review process and timelines are driven by Congressional mandates for many of the programs. Further, some programs are co-managed with other DHS components, such as Customs and Border Protection, Transportation Security Administration, Office of Infrastructure Protection, and the United States Coast Guard, requiring FEMA to work closely with those agencies to coordinate these processes. FEMA coordinates with these partners to conduct the most efficient field and national reviews of applications, taking into account the different structures in place in these agencies.

In some cases, legislation may hinder our ability to eliminate overlap among some programs. For example, ferry systems are eligible to apply in both the Port and Transit Security Grant Programs, although Grant Programs Directorate (GPD) mandates that applicants can only apply

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in one or the other program, legislation requires FEMA to make the systems eligible for either program.

In reference to the statement that the level of detail in grant applications/investment justifications is insufficient, we hear the exact opposite from stakeholders regarding the level of detail in grant applications and IJ submission requirements. Stakeholders tell us that the guidance needs to be streamlined and the application/IJ submission process simplified.

Although States may not have a written grants strategy, nor are they required to do so, they do have established methods to oversee the use of grant funds. The States and urban areas are also required to have a Homeland Security Strategy and the expenditure of grant funds should support the goals and objectives identified in the Strategy. Additionally, our monitoring provides the opportunity to verify these State developed mechanisms are in place.

Recommendation 2: Document specific agency roles and responsibilities for cross-program coordination of grant application and review processes and ensure internal DHS coordination is in place. This may include establishing memorandums of agreement if roles are outside the Federal Emergency Management Agency.

Response: FEMA concurs with this recommendation. We believe the future implementation of the Non Disaster (ND)-Grants system may mitigate some of the issues noted. For example, a grantee's identifying information will not have to be entered into the system for subsequent applications as the system will pre-populate certain fields of the application.

As noted in IP's comments on the Report, IP and FEMA have established specific roles and responsibilities for coordination of the BZPP in a draft MOA that is still in the review process. FEMA is also in the process of establishing MOAs with other components.

Currently, we must use (and require our grantees to use) a number of disparate systems from our legacy organizations [Office of Justice Programs for grants management system, FEMA financial system, and a separate system for Assistance to Firefighters Grants (AFG)] to manage billions of dollars of grant funds and thousands of grant awards. Consequently, there is some duplication and inefficiency. The Department, along with FEMA, is working on a Department-wide grants management system that should mitigate some of the systems issues.

Finally, given the different requirements and specialization across FEMA's portfolio of grant programs, we cannot use the same peer review panel for all grant programs. The panelists are allowed to participate by their parent agency (whether it be Federal, State, or local) and they do not have the ability to devote weeks and months to these processes. In addition, not all panelists are qualified to review all applications. For example, an excellent panelist for AFG awards might be a total misfit reviewing an application for a non-profit security grant.

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Recommendation 3: Work with Congress and state grant administrators to identify opportunities and implement actions to streamline and standardize multiple preparedness grant program application processes.

Response: FEMA concurs with this recommendation. FEMA has robust interaction with Congress, OMB, and numerous stakeholder communities. We routinely engage stakeholders in soliciting their feedback and recommendations and incorporate those into our program guidance and procedures as we deem they are beneficial to the overall program goals and in line with Congressional and Departmental goals.

FEMA is currently standing up a Preparedness Task Force to be comprised of State, Tribal, local and private sector experts who will be charged with evaluating the Agency's preparedness efforts, including the structure and requirements of its grant programs. We expect Task Force recommendations on improving these and other activities by the end of the current fiscal year.

Thank you again for the opportunity to comment on this draft report and we look forward to working with you on other issues as we both strive to improve FEMA.

Homeland Security Grant Program
The Homeland Security Grant Program includes four programs that fund activities to strengthen the Nation against risks associated with potential terrorist attacks. Funding priorities focus on three objectives: (1) measuring progress in achieving the National Preparedness Guidelines; (2) strengthening improvised explosive device attack deterrence, prevention, and protection capabilities; and (3) strengthening preparedness planning. Funding activities include preparedness planning, equipment acquisition (including interoperable communications), training, exercises, management, and administration.

The four programs listed below are awarded under the Homeland Security Grant Program:

State Homeland Security Program: Supports terrorism and catastrophic event preparedness by building and sustaining capabilities at the state and local levels through planning, organization, equipment, training, and exercise activities. This program helps states implement state homeland security strategies, the National Preparedness Guidelines, the National Incident Management System, and the National Response Framework.

Urban Areas Security Initiative: Directly supports the national priority on expanding regional collaboration. This program addresses unique multidisciplinary planning, operations, equipment, training, and exercise needs of high-risk, high-density urban areas.

Metropolitan Medical Response System: Assists designated metropolitan areas to sustain and further enhance regionally integrated all-hazards mass casualty preparedness and response capabilities. Funding is provided to designated localities to assist in maintaining and updating plans, delivering training, purchasing equipment and pharmaceuticals, and conducting exercises.

Citizen Corps Program: Supports Citizen Corps councils with efforts to engage citizens in personal preparedness, exercises, ongoing volunteer programs, and surge capacity response; and to better prepare citizens to be fully aware, trained, and practiced on how to prevent, protect, mitigate, prepare for, and respond to all threats and hazards. This

program provides funding for planning, organizational, equipment, training, exercise, and personnel needs.

Assistance to Firefighters Grant Program
Provides resources directly to fire departments and emergency medical services organizations to obtain critically needed equipment, protective gear, emergency vehicles, training, and other resources to protect the public and emergency personnel from fire and related hazards. This program supports the following priorities: enhancing national capabilities, risk-based funding, and interoperability.

Buffer Zone Protection Program
Supports the development and implementation of Buffer Zone Plans for prevention and protection activities outside the perimeter of critical infrastructure and key resource sites. The program provides funding to states and territories for first responder equipment and planning to build security and risk-management capabilities to secure critical infrastructure from potential terrorist attacks.

Commercial Equipment Direct Assistance Program
Enhances regional response capabilities, mutual aid, and interoperable communications by providing technology and equipment, together with training and technical assistance required to operate that equipment, to public safety agencies in smaller jurisdictions and certain metropolitan areas to prevent, deter, and respond to terrorist attacks as identified in state homeland security strategies.

Emergency Management Performance Grant Program
Assists state and local governments in efforts to sustain and enhance the effectiveness of their all-hazards emergency management programs. This program provides funding to states and territories for emergency management planning, equipment, training, and exercise activities.

Emergency Operations Center Grant Program
Intended to improve emergency management and preparedness capabilities by supporting sustainable, secure, and interoperable emergency operations centers. This program provides funding for the construction or renovation of principal state, local, and tribal emergency operations centers.

Interoperable Emergency Communications Grant Program
Provides planning, training, and exercise funding to states, territories, and local and tribal governments to carry out initiatives to improve interoperable emergency communication capabilities and support the implementation of statewide communication interoperability plans.

Port Security Grant Program
Provides funding to eligible ports for domain awareness including port access control identification, training, and exercises; and capabilities to prevent, detect, respond to, and recover from attacks involving improvised explosive devices and other nonconventional weapons. Program funding priorities focus on the highest risk port systems and regional security cooperation.

Regional Catastrophic Preparedness Grant Program
Supports the eight most urgent national planning scenarios as defined in the National Preparedness Guidelines. The program's goal is an integrated planning system that provides for regional all-hazards planning for catastrophic events and the development of necessary plans, protocols, and procedures to manage such an event. This program focuses on high-risk urban areas and surrounding regions where the impact will have the most significant effect on our Nation's collective security and resilience. Funding priorities include developing enhanced regional plans and addressing shortcomings in jurisdiction plans to support the management of a catastrophic incident, creating regional planning processes, and linking operational and capabilities-based planning for resource allocation.

Transit Security Grant Program
Creates a risk-based effort for the protection of critical transit infrastructure from terrorism, major disasters, and other emergencies. Funding is provided to owners and operators of the Nation's critical transit infrastructure, including rail, intracity bus, ferry systems, and Amtrak. Funding priorities include highest risk systems in the largest metropolitan areas, project quality and effectiveness, and regional security collaboration. Allowable expenses include planning, operational costs, equipment, training, and exercises.

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