



Emergency Management Division Informational Letter

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TO: Local Emergency Managers and Planners, District Emergency Management Coordinators
SUBJECT: Clarification of Hiring Procedures for EMPG Program Managers

The Department of Homeland Security (DHS) provides funding to the state under the Emergency Management Performance Grant (EMPG) to support the development and maintenance of an emergency management program. The primary means for the state to encourage local emergency management programs is fiscal support for the position of local emergency manager. To accomplish this, the state passes through part of the EMPG to local emergency management programs to fund a local program manager to improve mitigation, preparedness, response, and recovery capabilities for all hazards.

Recently, there has been some confusion and many questions have been raised pertaining to the issue of supplanting in regard to the hiring of and reimbursement for program managers. The objective of this letter is to set forth procedures pertaining to the hiring of program managers to ensure that supplanting is avoided. Both full and part-time hiring is addressed.

Procedure for hiring a new program manager

By law, federal funds must be used to supplement existing funds for program activities and must not replace funds that have been appropriated for the same purpose. EMD is tasked with the duty of ensuring such supplanting does not occur pertaining to the hiring of local emergency managers. During the annual grant application review, post-award monitoring, and audit, EMD will address supplanting with regard to the hiring and reimbursement of local program managers. Supplanting will also be addressed during the transition/hiring of local program managers. EMD prorates EMPG funding according to the documented (and verified) percentage of time allotted for emergency management. EMD requires that local records be maintained at the worksite that clearly show the percentage of time actually spent on each job and that these records be made available for review upon request by EMD audit staff. If there are indications of supplanting, the applicant or sub-grantee will be required to supply documentation demonstrating that the reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

When a jurisdiction requests that its full-time fire chief, 9-1-1 administrator, or other full-time employee be appointed as the emergency program manager, the jurisdiction will have to demonstrate that the fire chief's, 9-1-1 administrator's, or other full-time employee's normal duties have been reduced by the amount of hours that the chief/administrator has been assigned to work on emergency management tasks. Anything contrary to this action would be in violation of a supplanting clause that is present in general federal grant language and specifically in the Emergency Management Performance Grant program. This clause prohibits utilizing federal grant funding to replace funding allocated from county or municipal general funds or other funding sources.

Hiring of full-time program managers:

EMD strongly encourages each emergency management program to provide a full-time local emergency manager. A full-time manager is needed to complete all the necessary functions of the EMPG, including planning, training and exercising.

Questions have been raised both within EMD and from other sources about funding for program managers who do not have the day-to-day responsibility for the emergency management program. Such positions are no longer eligible for EMPG funding. Positions that are currently held by local emergency managers with dual roles will be eligible for continued funding only until another person fills the position. At that time, EMD will review the position description and determine the EMPG funding percentage based on EMPG duties only. A person appointed as local emergency manager after the date of this policy who is a full-time fire chief, 9-1-1 administrator, or has another full-time non-emergency management position will not be considered for EMPG funding. (One such program still exists within the state under this grandfather clause, but will not be allowed to maintain that arrangement after the current manager leaves that position.)

Hiring of part-time program managers:

It is recognized that a few programs with very small population bases may not require a full-time local emergency manager. In those instances where the position is part-time, EMD recommends the local emergency manager be employed for a minimum of 20 hours per week. It is possible, therefore, for a program manager to work more than one part-time job. When a local emergency manager has more than one job, the EMPG funding must be proportional to the percentage of time spent on emergency management.

A jurisdiction, which has in the past employed a full-time fire chief or 9-1-1 administrator, may choose to reduce the fire chief's fire administration hours or the 9-1-1 administrator's hours and transfer those hours to performing the emergency program manager function. EMD does allow this arrangement. The jurisdiction would be required to provide program documentation justifying this arrangement in the event of a state or federal program audit. That documentation should consist of the following:

- A signed statement from the chief elected official of the jurisdiction indicating that the fire chief/9-1-1 administrator position was reduced to part-time status, the date this occurred, and that the subsequent remaining hours of the 40 hour week would be relegated to emergency management duties.
- Time sheets that clearly delineate hours worked on emergency management activities and those worked on fire department administration or 9-1-1 administrator duties.
- A position description that clearly outlines the duties of the fire chief or 9-1-1 administrator and those of the emergency program manager.

The Emergency Management Act also allows two or three adjoining counties to appoint an emergency program manager for the multi-county area. Two or three small programs should consider developing a consolidated program (or sharing the same local emergency manager without merging the programs) to provide economies of scale. Contact your EMD district coordinator for assistance in creating a merged or shared program.

A position description specific to the local emergency manager's job must be provided by each EMPG sub-grantee on a yearly basis or when there is a change of personnel. All jobs that the person appointed as local emergency manager performs must be included in the position description, including such other duties as fire chief or 9-1-1 administrator. The percentage of time spent on each separate job title must be specified in the position description.

Questions regarding this policy can be directed to your MSP EMD district coordinator or F/Lt. Ralph Hobrat at (517) 333-5048 or HobratR@michigan.gov.

Sincerely,



KRISTE K. ETUE, CAPTAIN
Deputy State Director of Homeland Security
and Emergency Management

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