2026

EMD-PUB 208
Revised June 2026
EMERGENCY MANAGEMENT AND
HOMELAND SECURITY DIVISION
Michigan Department of State Police

Emergency Management Performance Grant Guidebook

Table of Contents

Table of Contents 1
1. Introduction 3
2. The EMPG Program Overview 4
2.1 Eligibility 4
2.2 Grant Allocation Process 4
2.3 Period of Performance 4
2.4 Matching Funds 5
2.5 Requesting a Change in Funding Status or Becoming a New Funded Program 5
3. EM and EMC 6
3.1 EM 7
3.2 EMC 7
3.3 Hiring Policy and Requirements for Additional Assigned Duties 8
3.4 Part-time and Full-time EMs 9
3.5 Reporting Guidelines for EMPG Funded Personnel 9
4. Emergency Management Program Requirements 10
4.1 Local Jurisdiction Requirements 10
4.2 Local Emergency Management Responsibilities 13
5. Allowable and Unallowable Costs 16
5.1 General Guidance Regarding Allowable Costs 16
5.2 Eligible Costs Reimbursed by MSP/EMHSD 17
5.3 Unauthorized EMPG Expenditures 18
5.4 Supplanting 18
6. Work Agreement and Quarterly Reporting 19
6.1 Purpose of Annual Work Agreement 19
6.2 Work Agreement Workgroup 19
6.3 Work Agreement Items 19
6.4 Quarterly Reporting 19
6.5 Procedure for Quarterly Reporting of Local Program Performance 20
6.6 Local Budget for EMPG, EMHSD-017 20
7. Delay and Forfeiture Policy 20
7.1 Forfeiture Policy 20
7.2 Program Merit Sanctions 21

7.3 Sanctions That May Be Imposed 21
8. State Appeals Process 22
9. Records, Retention, and Availability 22
10. Single Audit Requirements 22
11. On-site Program Reviews 22
12. EMPG Grant Process Cycle - Application and Reporting 23

1. Introduction

The Emergency Management Performance Grant (EMPG) is under the authority of the Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA) Grant Programs Directorate. The EMPG is one of the grant programs that constitute DHS/FEMA's focus on all-hazards emergency preparedness. These grant programs are part of a comprehensive set of measures authorized by Congress and implemented by DHS. Aligning with the goals noted in the 2023-2027 DHS Strategic Plan, the EMPG program supports the goal to strengthen preparedness and resilience across the nation.

The EMPG assists with implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities essential to achieving the National Preparedness Goal to secure a resilient nation. Delivering core capabilities requires the combined effort of the whole community, rather than the exclusive effort of any single organization or level of government. The EMPG allowable costs support efforts to build and sustain core capabilities across the prevention, protection, mitigation, response, and recovery mission areas. Funds granted under the EMPG program must be used to support comprehensive emergency management at the state and local levels. Each state must maintain an emergency management program that includes the state and local capabilities that are essential for functioning as a part of the emergency preparedness system.

The Michigan State Police, Emergency Management and Homeland Security Division (MSP/EMHSD) strives to be a leader and a partner in protecting our homeland from all threats and hazards. The primary mission is to prevent, mitigate, prepare for, respond to, and recover from emergencies, disasters, and threats to our homeland.

The MSP/EMHSD has been designated under the Michigan Emergency Management Act, Public Act (PA) 390 of 1976, as amended (PA 390), as the single state agency to coordinate all emergency management activities between municipal, county, state, and federal governments. The MSP is designated by the governor to serve as the State Administrative Agency for FEMA Preparedness Grants. The director of the department assigned responsibility to the MSP/EMHSD. Each section of the division shares this responsibility. This includes such functions as state level administration and coordination; training and exercise; planning; and fiscal management and compliance. A portion of the EMPG funding is allocated to support these activities. The primary goal is to provide leadership and direction, to coordinate emergency management activities across stakeholders, and to implement federal and state requirements. The MSP/EMHSD maintains routine contact with federal, state, and local government officials as well as private sector representatives, to continuously improve upon the state's emergency management and homeland security position.

Coordination between the MSP/EMHSD and local emergency management programs is achieved through an MSP/EMHSD District Coordinator (DC). One DC is assigned to each of the eight emergency management districts in the state. The DC provides day-to-day administrative and technical support to local emergency management programs. During emergencies and disasters, the DC also acts as a point of contact and liaison for local programs with state and federal agencies.

The forms listed in this guide are provided as an example and for reference. Forms may be updated by the MSP/EMHSD. The most current process and/or version of any form can be found on the MSP/EMHSD website, under Grant Programs, and EMPG.

2. The EMPG Program Overview

The State of Michigan's EMPG award from FEMA provides funds for the MSP/EMHSD programs and pass-through funds for local emergency management programs for the improvement of mitigation, preparedness, response, and recovery capabilities for all hazards. The amount available for local programs is contingent upon the amount of funding received from FEMA.

2.1 Eligibility

To be eligible to receive EMPG funding, the local government must nominate a local Emergency Management Coordinator (EMC) and MSP/EMHSD recommends that a local Emergency Manager (EM) is hired. The EM must oversee the day-to-day operations of the emergency management program and remain in compliance with state and federal guidance by completing the requirements outlined in this guide. More information is provided in Section 3 EM and EMC.

2.2 Grant Allocation Process

Local emergency management programs must complete and submit the EMHSD-017 Local Budget for EMPG (EMHSD-017) to their assigned MSP/EMHSD DC for initial review and signature. The EMHSD-017 requires information about the local EM's salary and fringe benefit package as well as the hours devoted to maintaining the local emergency management program (LEMP). The MSP/EMHSD staff develop the initial EMHSD-031 LEMP Work Agreement/Quarterly Report (EMHSD-031) for the reporting period. The EMHSD-031 provides details about planned activities for the local emergency management program and outlines a list of suggested actions to accomplish the activities.

Once signed by the DC, the EMHSD-017 and EMHSD-031 are submitted to the MSP/EMHSD Financial Administration Unit for consideration. Once all local program budgets have been received and reviewed, the MSP/EMHSD compares the amount of funding received from FEMA to the total local budgets submitted to determine what percentage of the EM salaries and benefits can be covered by the EMPG program. The following example outlines how this percentage is determined:

EXAMPLE:

Budget and Funding	Amount
Total Salary and Fringe Benefits of Local EMPG-funded EM ……..	$5,000,000
EMPG Funding Available – Local …….	$2,000,000
Percentage of local salary and fringe reimbursed from EMPG ……	40%

In the example above, 40 percent of the local salary and fringe to be reimbursed is calculated by dividing the amount available for local programs by the total amount of salary and fringe.

2.3 Period of Performance

The performance period for EMPG pass-through grants coincides with the federal and state

fiscal year (FY), October 1 through September 30. It is required and necessary that approved activities be implemented and completed within the grant performance period determined for pass-through funding. All expenditures must have been incurred (paid or accrued) during the period of performance to be eligible for reimbursement, or to be used as a match.

2.4 Matching Funds

The EMPG requires a local match of at least 50 percent of the total cost of the project. Matching funds usually come from local funds appropriated specifically for that purpose. Other contributions, cash, and third-party in-kind contributions may be accepted as part of the matching share. Except as allowed by federal statute, no other federal grant funds can be used as a match.

Shared costs or matching funds and contributions, including cash and third-party in-kind contributions, will be accepted as cost sharing, or matching when such contributions meet all the following criteria:

1. Are verifiable;
2. Are not included as contributions for any other federal award;
3. Are necessary and reasonable to accomplish the project or program objectives;
4. Are allowable costs;
5. Are not paid by the federal government under another federal award.

The following documentation is required for matching cash contributions:

1. Record donor name or source of donation;
2. Date(s) of any/all donation(s);
3. Amount(s) of any/all donation(s);
4. Deposit slip(s) or verification of deposited funds.

The following documentation is required for matching third-party in-kind contributions:

1. Record donor name or source of donation;
2. Date(s) of any/all donation(s);
3. Amount(s) of any/all donation(s);
4. Deposit slip(s) or verification of deposited funds.

For further information on allowable sources and types of funds, timing of match contributions, and records for match, please consult the Code of Federal Regulations (CFR) Title 2, Subtitle A, Chapter II, Part 200, Subpart D, §200.306

Documentation must be retained and available for audit.

2.5 Requesting a Change in Funding Status or Becoming a New Funded Program

Counties that wish to:

1. Establish an emergency management program, or
2. Change the program's current part-time or full-time status, or
3. Replace a local emergency management program manager.

Must complete the two-step process described below[1]:

1. Local emergency management programs must complete and submit EMHSD-017 to the MSP/EMHSD DC assigned to the respective district.
2. Local emergency management programs must complete EMHSD-031 with the MSP/EMHSD DC assigned to the respective district.

Currently funded programs that wish to apply for EMPG funds must submit their EMHSD-017 and EMHSD-031 by the deadline established by the MSP/EMHSD, which will be included in the applicable fiscal year's report submission schedule. Once the available funding is allocated to all local jurisdiction applicants, award amounts cannot be reallocated to jurisdictions that apply after the deadline. If there is a decrease in the EM's pay, hours of work or responsibilities during the year, or a break in service in the EM's position, the MSP/EMHSD DC assigned to the respective district must be notified. The MSP/EMHSD will reduce the allocation proportionately. Funds from these reductions will be forfeited to the state but may be paid out to local programs through supplemental means at the end of the grant performance period for demonstrated allowable costs.

The MSP/EMHSD reserves the right to determine the suitability of any proposed new or revised position description or programmatic changes. A proposal for change will be evaluated for supplanting concerns and to ensure that revisions are reasonable in terms of the number of hours worked, change in responsibilities, etc. Questions concerning this application process can be directed to the assigned MSP/EMHSD DC.

Per PA 390, counties are required to have an EMC. MSP/EMHSD will approve EMPG funds for new county emergency management programs upon request if the jurisdiction meets eligibility requirements and assigns an EM to uphold the day-to-day operations of the emergency management program. If the county board of commissioners does not appoint an EMC, the chairperson of the county board can be nominated to fill the EMC role. However, the MSP/EMHSD will not provide EMPG if the chairperson of the county board acts as the EMC.

City and township emergency management programs that currently receive EMPG funding are considered eligible to continue receiving funding as long as all conditions for the application and use of funds exist. However, if a program opts out of EMPG funding or is discontinued and later reestablished, funding is not guaranteed in the future. To ensure funding for existing programs is not reduced, new or reestablished city or township programs will only be considered for funding if sufficient additional funding becomes available.

3. EM and EMC

The MSP/EMHSD provides EMPG funds to local jurisdictions to promote awareness, participation, and maintenance of comprehensive local emergency management programs. The

[1] Note: submitting an EMHSD-017 and completing a work agreement does not guarantee funding for a program.

EMPG funds are made available to support personnel costs associated with a dedicated local EM or a local EM who may also act as the EMC. The local EM and the EMC can be the same individual; duties may be separated where the local EM is responsible for the day-to-day operation of the emergency management program and the EMC maintains authority over the program under PA 390.

3.1 EM

The position of the local EM is responsible for the everyday direction, supervision, and administration of a comprehensive emergency management program. This individual develops plans, provides training, coordinates exercises, and assesses needs of the community relative to emergency management, disaster preparedness, and recovery assistance. Local EMs also play a key role during a disaster or an emergency, however; this individual may not be vested with the same authorities outlined in PA 390 as an EMC. In cases where the duties are separated, a local EM may be required to obtain approval from an appointed EMC when making certain decisions. The salary and fringe benefit costs for this position are used in calculating the program's annual EMPG allocation. For additional details regarding the responsibilities of the local EM see Section 4.2 Local Emergency Management Responsibilities.

3.2 EMC

The PA 390 requires each county to establish a local emergency management program and nominate an EMC. The EMC is vested with the authority articulated in PA 390, and acts for and at the direction of the chairperson of the county board of commissioners or the Chief Executive Officer (CEO). An EMC is the individual appointed to coordinate emergency management activities within the county or municipality; however, this individual may or may not manage an emergency management program on a day-to-day basis; in some jurisdictions, this individual only engages in emergency management during times of crisis. For additional information regarding the appointment, duties, and eligibility of an EMC, reference PA 390.

For purposes of this guidebook, the term local EM is used to reference positions eligible to receive EMPG funding and the responsibilities associated with receipt of the funds. Although often used interchangeably, the term emergency management coordinator is only used in this document to reference the statutorily[2] required appointment, independent of the EM position, unless otherwise noted.

Section nine of PA 390 specifies that the EMC shall act for, and at the direction of, the chairperson of the county board of commissioners in coordination of all matters pertaining to emergency management in the county, including mitigation, preparedness, response, and recovery.

In counties with an elected county executive, the county EMC may act for and at the direction of the county executive.

Under the Michigan Emergency Management Act, not more than three adjoining counties may appoint an EMC for the multi-county area through an adopted resolution. The counties should contact the MSP/EMHSD DC assigned to the respective district for assistance in creating a merged or shared program.

[2] Statutory requirements of Public Act 390 of 1976, as amended, can be found at the State of Michigan Legislature website http://legislature.mi.gov/doc.aspx?mcl-act-390-of-1976

A municipality with a population of 25,000 or more shall either appoint a municipal EMC or appoint the county coordinator as the municipal EMC. The coordinator shall be appointed by the CEO. The EMC shall be the municipal CEO if no one is appointed. The coordinator of a municipality with a population of 25,000 or greater shall act for and at the direction of the CEO of the municipality or the official designated in the municipal charter in the coordination of all matters pertaining to emergency management, disaster preparedness, and recovery assistance within the municipality.

Municipalities with a population of 10,000 or more, but less than 25,000, may appoint an EMC. They shall act for and at the direction of the CEO or the official designated by the municipal charter in the coordination of all matters pertaining to emergency management, disaster preparedness, and recovery assistance within the municipality.

A municipality having a population of less than 10,000 may appoint an EMC who shall serve at the direction of the county EMC.

A public college or university with a combined average population of faculty, students, and staff of 25,000 or more, including its satellite campuses within this state, shall appoint an EMC. Public colleges or universities with a combined average population of faculty, students, and staff of 10,000 or more, but less than 25,000, including its satellite campuses within this state, may appoint an EMC. Currently, public colleges and universities, regardless of size, are not eligible to receive EMPG funding and there are no formal program requirements.

3.3 Hiring Policy and Requirements for Additional Assigned Duties

Fiscal support is the primary means to encourage maintenance of local emergency management programs and the position of the EM. Annual funding allocation is based on salary and fringe benefits of the individual designated to hold the EM position (limited to one individual). When a local EM has more than one job, the funding must be proportional to the percent of time spent on emergency management.

As a condition of EMPG funding, a local EM who performs non-emergency management functions in addition to emergency management functions must provide the MSP/EMHSD with a position description that specifies the percentage of time spent on each job. All jobs performed by the EM must be included in the position description, including additional public safety positions and responsibilities such as fire chief or 911 administrator or operator, or other non-emergency management positions. The position description must also include the percent of time spent on each additional job title or duties, and it must provide a detailed description of all responsibilities.

It is the policy of the MSP/EMHSD to prorate funding according to the documented and verified percent of time allotted for emergency management activities. Records clearly showing the percent of time spent on each job must be retained and made available for review upon request by the MSP/EMHSD. An EMC who does not have day-to-day responsibility for the emergency management program is not eligible for EMPG funding. Additionally, a person appointed as a local EM who has another full-time public safety position or responsibilities, or other non-emergency management position is also ineligible for EMPG funding.

When a new EM is hired to fill a position previously held by a local EM serving dual roles, the most current position description, resume, and professional biography must be provided to the MSP/EMHSD. At that time, the MSP/EMHSD will review the position description, resume, and

professional biography and determine the EMPG funding percent based on EMPG duties only.

When designating a new local EM, a jurisdiction may request that a full-time public safety position, or other non-emergency management full-time employee be appointed to the local EM position. However, the jurisdiction will have to demonstrate that the employee's normal duties have been reduced by the number of hours assigned to emergency management tasks.

Anything contrary to this action would be in violation of a supplanting clause that is included in general federal grant language and specifically noted in the FEMA Preparedness Grants Manual[3]. This clause prohibits utilizing federal grant funding to replace funding allocated from county or municipal general funds or other funding sources. The jurisdiction would be required to provide documentation justifying this arrangement in the event of a state or federal program audit. Since subrecipients certify that they have not reduced non-federal funds because of receiving federal funds, the reduction must have occurred for reasons other than replacing a reduction in non-federal funds or solving budget shortfalls in general fund programs.

Documentation should consist of the following:

1. A signed statement from the appropriate jurisdictional representative indicating that the public safety position was reduced to part-time status, the effective date of any changes in duties, and a statement noting that the subsequent remaining hours of the 40-hour week will be dedicated to emergency management duties.
2. Time sheet(s) that clearly delineate hours worked on emergency management activities and those worked on other public safety responsibilities.
3. A position description that clearly outlines the duties of the public safety position, or non-emergency management position, and the responsibilities of the local EM.
4. A completed EMD-021 Emergency Management Coordinator Information (EMD-021).

3.4 Part-time and Full-time EMs

The MSP/EMHSD strongly encourages each emergency management program to provide a full-time local EM. It is recognized that programs with very small population bases may not be able to support a full-time local EM. In instances where the position is part-time, the MSP/EMHSD recommends the local EM be employed for a minimum of 20 hours per week.

3.5 Reporting Guidelines for EMPG Funded Personnel

The MSP/EMHSD does not mandate a standardized process for EMPG funded personnel time accounting. Subrecipients have the flexibility to determine the method of time accounting that best accommodates their processes. However, all EMPG-funded personnel must document activities in a manner that is in accordance with 2 CFR 200.430 Compensation and must make documentation available upon request during an audit or monitoring visit. EMPG-funded personnel who also perform non-EMPG duties must account for all hours of compensation, regardless of funding source. In such cases, the EMPG and non-EMPG hours should be identified separately yet still recorded on the same activity log, accounting for all activities. This applies to any individual who serves as a local EM and another position (i.e., any public safety

[3] FEMA Preparedness Grants Manual, Appendix H: Unallowable costs include "Costs that supplant traditional public safety positions and responsibilities"

position, 911 director or operator, planner, first responder, or any non-emergency management position).

2 CFR 200.430 (Standards for Documentation of Personnel Expenses):

Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

1. Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated.
2. Be incorporated into the official records of the non-federal entity.
3. Reasonably reflect the total activity for which the employee is compensated.
4. Encompass federally assisted and all other activities compensated by the non-Federal entity.
5. Comply with established accounting policies and practices of the non-Federal entity.
6. Support the distribution of employees' salaries among specific activities if multiple funding sources are used.
7. Not based on budget estimates alone.

The EMPG-funded personnel time-accounting documentation must meet the above 2 CFR 200.430 requirements and documentation for salaries and wages should include the details listed below:

1. Name of the EMPG funded employee being compensated;
2. Reporting period, start and end dates;
3. Total hours worked per day with breakdown by funding source (including EMPG and non-EMPG activities);
4. Total hours worked for the pay period with breakdown by funding source (including EMPG and non-EMPG activities);
5. Signature of the EMPG funded employee;
6. Supervisor's approval.

4. Emergency Management Program Requirements

4.1 Local Jurisdiction Requirements

The local government must meet the following minimum program and fiscal requirements:

1. Appoint a local EMC and hire a local EM. The local EM must be able to assume responsibility and satisfactorily complete, as scheduled, the following functions as identified in EMHSD-031 LEMP Work Agreement/Quarterly Report:
    i. Ensure that the jurisdiction promulgates laws, ordinances, resolutions,

policies, and procedures to carry out emergency financial and administrative responsibilities. The EMPG-funded local EM shall provide a copy of their position description(s) that includes their emergency management activities; additionally, the EM shall provide a current resume and short professional biography. Emergency management activities of the local EM and other response personnel shall be identified in the emergency management ordinance, resolution, and county plans.

ii. Comply with PA 390 and applicable laws and regulations and include a local emergency management resolution.

iii. Continually identify natural, technological, and human-caused hazards that potentially impact the jurisdiction. The jurisdiction shall assess the risk and vulnerability of people, property, the environment, and its own operations from these hazards. The jurisdiction should also conduct a consequence/risk analysis for significant hazards to consider their impact on the public, responders, continuity of operations including the delivery of services, property, facilities, and infrastructure; the environment; the economic condition of the jurisdiction; and public confidence in the jurisdiction's governance.

iv. Participate in activities to eliminate hazards or mitigate the effects of hazards that cannot be reasonably prevented. If the jurisdiction intends to receive hazard mitigation funds, the EM must ensure that the jurisdiction's hazard mitigation plan is developed and updated every five years.

v. Implement a strategy across disciplines to coordinate prevention activities, to monitor the identified threats and hazards, and adjust the level of prevention activity commensurate with the risk, including procedures for exchanging information between internal and external stakeholders to prevent incidents.

vi. Maintain a current Emergency Operation Plan (EOP) or Emergency Action Guidelines (EAG) that meets the criteria in the MSP/EMHSD Publication (Pub) 201a, Review Guide for Local Emergency Operations Plans and Emergency Action Guidelines (Pub 201.a). Verify that each jurisdiction whose population exceeds 10,000 also complies with PA 390 Administrative Rules relating to maintaining an emergency support plan. The jurisdiction must verify that the EOP or EAG and supplemental emergency support plans are updated every four years. The current chair of the board of commissioners, or the jurisdiction's CEO must sign the updated/revised EOP, or EAG, and emergency support plans.

vii. Comply with Homeland Security Presidential Directive-5[4] and Michigan Executive Directive 2005-09 by formally adopting the National Incident Management System (NIMS) to provide for efficient and effective

[4] Homeland Security Presidential Directive-5 published February 28, 2003

emergency response operations amongst multiple agencies and jurisdictions. The program shall establish a means of interfacing on-scene incident management with the jurisdiction's Emergency Operations Center (EOC).

viii. Comply with the NIMS resource management requirements including identification, location, acquisition, storage, maintenance, distribution, and accounting for services and materials to address hazards identified in the jurisdiction. The jurisdiction must maintain NIMS-typed resources and update resources using a resource inventory system, such as the Michigan Critical Incident Management System, Incident Resource Inventory System (IRIS), etc.[5]. The local EM should also develop Mutual Aid Agreements (MAA) and promote membership in the Michigan Emergency Management Assistance Compact to address resource shortfalls and reduce resource gaps.

ix. Communicate both internally and externally with all emergency management program stakeholders and emergency personnel. The local EM shall disseminate disaster-related information and emergency alerts and warnings to response personnel, EOC staff, state and federal government officials, and the public. The systems should be interoperable with other communication systems. For more information, see the EMHSD Pub 115 Michigan Alerts, Warnings, and Notifications Plan (AWN).

x. Develop procedures that reflect operational priorities including life, safety, health, property protection, environmental protection, restoration of essential utilities, restoration of essential functions, and coordination among all levels of government. Procedures shall also be developed to guide situation assessment, damage assessment (DA), situation reporting, and incident action planning. The local EM shall have a primary EOC, capable of coordinating and supporting response and recovery operations. The EOC shall have activation, operation, and deactivation procedures that are updated regularly.

xi. Implement a formal, documented training program composed of training needs, assessments, a curriculum, course evaluations, and records of training. Necessary training include: NIMS training courses (IS 100, 200, 700, & 800) and the Professional Development Series (PDS). The completion of these courses should be tracked and submitted to the MSP/EMHSD by the required deadlines[6]. The local EM shall also promote available emergency management training for all personnel, including EOC staff, specific to their responsibilities.

xii. Implement a documented exercise program that regularly tests the skills, abilities, and experience of emergency personnel, as well as plans,

[5] https://preptoolkit.fema.gov/web/national-resource-hub/resourceinventorying
[6] Details regarding the submission process will be provided to the EM program with the work agreement.

policies, procedures, equipment, and facilities. Exercises will comply with local, state, and federal requirements, including the Homeland Security Exercise and Evaluation Program (HSEEP).

xiii. Provide preparedness information and education to the public concerning threats to life, safety, and property. These activities include information about specific threats, appropriate preparedness measures, actions to mitigate the threats including protective actions, updating the public website, and promoting hazard awareness weeks and campaigns.

2. Annually submit the current year EMHSD-031 LEMP Work Agreement/Quarterly Report to the MSP/EMHSD for approval.

3. Annually submit official position description(s), including both EMPG and non-EMPG duties, for all employees funded under the EMPG program. Any new or revised position description must also be submitted to the MSP/EMHSD at the point of revision.

4. Retain all financial records, supporting documents, statistical records, and all other records pertinent to the EMPG program for at least three years after the MSP/EMHSD files the final grant report with FEMA, for purposes of federal or state examination and audit.

Comply with the Hatch Act, 5 U.S.C. §§ 7321-7326. The Hatch Act limits certain political activities of most federal employees, as well as some state and local government employees who work in connection with federally funded programs. For example, the law prohibits employees from engaging in political activity while on duty or in the federal workplace. It also prohibits them from soliciting or receiving political contributions.

i. Employee conduct is also subject to state laws and the regulations of the employing agency.

4.2 Local Emergency Management Responsibilities

Detailed responsibilities of the local EM are detailed in the EMHSD-031 LEMP Work Agreement/Quarterly Report each year. These requirements are identified in section 4.1 (A). This section outlines additional information and resources for key responsibilities of the EM and the local emergency management program.

4.2.1 Planning

The local EM is responsible for the development and implementation of the community's EOP, mitigation plan, and other planning documents needed to prepare the jurisdiction for its mitigation, response, and recovery functions. Planning is an extremely critical piece of emergency management; if a program fails to complete required planning activities during the FY, they may forfeit federal funding.

Local EMs are responsible for the development and implementation of the jurisdiction's EOP/EAG. The MSP/EMHSD publishes several planning documents to assist local emergency management programs in the development of this plan. The following publications can be found at MSP/EMHSD Programs & Publications page.

The EMHSD Pub 201: Local Emergency Planning Workbook – Promotes a common understanding of the fundamentals of planning and decision-making to help EMs examine a threat or hazard and produce integrated, coordinated, and efficient response capabilities.

Planning templates are available for the MSP/EMHSD-supported EOP/EAG plan types. Templates include a traditional function based EOP, an agency based EOP, an Emergency Support Function EOP, and an EAG.

The EMHSD Pub 201a: Review Guide for Local Emergency Operation Plans and Emergency Action Guidelines – Determines whether a community's emergency management planning documents are in accordance with federal and state planning standards. The local EM is responsible for filling out Pub 201a and submitting it to the DC with each major plan update. The MSP/EMHSD planning staff will conduct a comprehensive review of the EOP/EAG and provide feedback to the local program. The EOP or EAG must meet all criteria listed in Pub 201a and be approved by the DC and planning staff to be considered adequate. Each EOP/EAG template has a corresponding section in this publication.

The EMHSD Pub 204: Support Emergency Operations Plan Guide – Designed to assist local municipalities that have a population of 10,000 or more with developing a support plan to be incorporated into the county EOP/EAG.

The EMHSD Pub 305: Local Emergency Planning Committee Handbook – The local EM is encouraged to support the completion of off-site response plans for hazardous materials sites in the local jurisdictions. This support includes actively participating with or on the Local Emergency Planning Committee (LEPC) that has responsibility for the jurisdiction, including organizing and/or chairing the committee, if necessary. The local EM should also work with the local fire departments in the jurisdiction to encourage the development of fire-fighter right-to-know plans.

The EMHSD Pub 308: Guidance for Community HAZMAT Response Plans – Intended to assist LEPCs and the local EM with completing Superfund Amendments and Reauthorization Act (SARA) Title III Off-site Emergency Response Plans for facilities (both industrial and agricultural) that have reportable quantities of Extremely Hazardous Substances determined by standards set by the Environmental Protection Agency (EPA), that exceed the threshold planning quantity. The local EM may also utilize the SARA Title III Off-Site Response Template available through the MSP/EMHSD. The United States EPA website[7] also provides several resources.

The EMHSD Pub 207: Local Hazard Mitigation Planning Workbook – Another plan that is vitally important to the community is a hazard mitigation plan. Each local emergency management program should be actively involved in the development and implementation of a hazard mitigation plan. Local EMs can also reference the EMHSD Local Hazard Mitigation Planning Workbook, FEMA Local Mitigation Planning Handbook (published May 2023), and the FEMA Local Mitigation Plan Review Guide (published October 2011).

4.2.2 Training

All EMPG funded personnel are expected to be trained EMs and are required to complete the following training and record proof of completion:

[7] EPA website https://www.epa.gov/emergency-response

1. NIMS training courses
2. PDS

The required NIMS and PDS courses are also part of Michigan's Professional Emergency Manager (PEM) designation program which provides an overview of emergency management principles from both the national and state perspective. The PEM program is administered by MSP/EMHSD training staff, who develop, coordinate, and deliver instructions on NIMS, the Incident Command System, All-Hazards Incident Management Teams, and additional emergency management subject areas.

The MSP/EMHSD publishes a schedule of training courses online at EMSHD Training and Exercise. Multiple courses are offered each FY. Many of the emergency management courses are offered to employees of local government and state agencies at no cost. However, some courses may have pre-requisite courses or a registration fee. All course information and details can be found at the EMHSD Training and Exercise website.

In addition to the emergency management courses, the EMHS Training Center (EMHSTC) provides specialized training for local public safety personnel and first responders (as well as private sector employees, upon request) with a variety of hazardous material awareness/response courses, and Chemical, Biological, Radiological, and Nuclear Defense, and Weapons of Mass Destruction terrorism topics. The EMHSTC staff also coordinate federally funded training (both in and out of state). The National Disaster & Emergency Management University course applications are submitted through the State Training Officer, and the National Domestic Preparedness Consortium (NDPC) courses are vetted by the MSP.

4.2.3 Exercises

The purpose of various types of exercises is to enhance the whole community's preparedness posture by using an evaluated assessment of emergency management capabilities which also identify capability gaps. This can be accomplished by testing the plans of an individual organization, or a group of interdependent organizations that need to accomplish an identified function or task.

All EMPG funded personnel receiving funding for any portion of their salary, benefits, or other expenditures must participate in at least one exercise in the 12-month FY grant period. Exercise roles include the exercise director, player, evaluator, controller, and can include assisting as a player in a simulation cell. Observation of an exercise does not count as participation.

The one required exercise for the FY must be conducted within the EMPG-funded jurisdiction and test the local emergency management program's EOP[8].

At least one After Action Report and Improvement Plan (AAR/IP) must be submitted to the MSP/EMHSD each FY. The AAR/IP must follow an exercise which tests the local jurisdiction or program's EOP within the same FY. Effort shall be made to submit the AAR/IP within 90 days of the exercise conclusion, and it is requested that all AAR/IPs be submitted to the EMHSD for tracking purposes.

4.2.4 Advocacy

Advocacy requires local EMs to be visible in the community, and consistent in the message that

[8] This requirement is presented in PA 390 (R30.51 Rule 1 (i)(D))

emergency management is intended to help save lives, protect property and the environment, and create a higher quality of life in the community. Advocacy may require routine involvement in various community efforts such as, but not limited to, fire safety and prevention, school safety, exercising, training, capital improvements planning, and homeland security concerns.

The local EM should also be involved in SARA Title III planning through the LEPC. The planning responsibility is entrusted with the LEPC; but the local EM should be aware of what is included in each plan, since those plans are to be incorporated in the county-wide EOP. The LEPC may also choose to rely on the local EM for primary planning duties related to SARA Title III.

5. Allowable and Unallowable Costs

Use of the EMPG local grant is limited to reimbursement of the salary, overtime, compensating time off, and associated fringe benefits of the local EM, consistent with jurisdictional policies.

Please refer to 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, for information on salary and fringe benefits. Proof of payment, such as approved timesheets, payroll registers, and copies of cancelled checks or employee pay stubs must be provided with the billing form before reimbursement can be processed.

The EMHSD-007 EMPG Quarterly Billing form serves as the billing form that is submitted to MSP/EMHSD on a quarterly basis, along with all supporting documentation, for costs incurred by the local jurisdiction for the EMPG program. The financial officer for the local jurisdiction is required to certify that the expenses submitted in EMHSD-007 are correct and have been incurred and paid by the local jurisdiction. The jurisdiction's financial officer that certifies the EMHSD-007 cannot be the local EM. Other necessary expenses such as travel, office supplies, rent and maintenance of office space, utilities, and insurance may be billed for reimbursement under the five percent organization allowance after all payroll costs for the grant award year have been reimbursed to the local program. If organization costs are claimed, a narrative must be submitted detailing the expenses that are included in these costs. Please note that the five percent organization allowance is included as part of the local allocation, not in addition to the allocated amount.

As outlined in Section 2.4, a cost-match is required under the EMPG program. The federal share used towards the EMPG budget cannot exceed 50 percent of the total budget; the federal award must be equally matched. Federal funds cannot be used to match federal funds. The match from non-federal sources can be met through cash or third-party in-kind sources. For further information on allowable sources and types of funds, timing of match contributions, and documentation for match, please consult 2 CFR Part 200 Section 306.

5.1 General Guidance Regarding Allowable Costs

Costs charged to this grant must be consistent with the Cost Principles for Federal Awards outlined in 2 C.F.R. 200, Subpart E.

Factors affecting allowability of costs under federal awards:

1. Be allowable.

i. Be necessary and reasonable for the performance of the federal award and be allocable thereto under these principles.

ii. Conform to any limitations or exclusions set forth in these principles or in the federal award as to types or amount of cost items.

iii. Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the non-federal entity.

iv. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost.

v. Not included as a cost or used to meet cost sharing or matching requirements of any other federal award, in either the current or a prior period, except as specifically provided by federal law or regulations.

vi. Be adequately documented.

2. Be reasonable.
3. Be allocable.
4. Be net of applicable credits.
5. Consider the total cost.

5.2 Eligible Costs Reimbursed by MSP/EMHSD

The following costs are eligible for reimbursement under the EMPG:

1. Personnel compensation and benefits

    i. Personnel compensation includes gross compensation (before deductions for taxes and other purposes) for the services of employees engaged in emergency management activities.

    ii. Fringe benefits include the applicant's share of payments for vacation, sick leave, other leave, the emergency management share of terminal leave, and as the employer's contributions for Social Security, life and health insurance plans, employment insurance coverage, worker's compensation insurance, pension plans, severance pay and similar benefit entitlements. These benefits must be granted under approved official government plans for compensating their employees and distributed equitably to grant programs and other activities. If an incentive award system is in effect, awards for employee suggestions and efficiency are also included.

2. The local jurisdiction may use any allocation remaining after all payroll related costs have been reimbursed, up to five percent of the local EMPG allocation amount, for allowable organization activities which directly support the local emergency management program. This is part of the local allocation and is not in addition to the allocated amount. Organization activities are defined as directly relating to all-

hazards emergency management operations, staffing, and other day-to-day activities, in support of emergency management. If organization costs are claimed, a narrative statement must be submitted detailing the expenses for which reimbursement is being requested. The organization allowance cannot be used to reimburse existing staff as this would result in supplanting.

5.3 Unauthorized EMPG Expenditures

Grant funds must comply with FEMA Policy 207-22-0002 and may not be used for the purchase of the following:

1. Weapons, including firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed.
2. Expenditures on weapons systems and/or ammunition systems.
3. Costs to support hiring sworn public safety officers for the purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities.
4. Activities and projects unrelated to the completion and implementation of the EMHSD-031 LEMP Work Agreement/Quarterly Report.

The following items are not allowable under federal grants in general:

1. Alcoholic beverages;
2. Contributions and donations;
3. Entertainment;
4. Fines and penalties;
5. General costs of government;
6. Interest fees, except for building acquisition, construction or fabrication, reconstruction, or remodeling;
7. Lobbying.

5.4 Supplanting

Supplanting funds is defined as using federal grant money to replace or take the place of existing local funding. The DHS grant funds may not be used to replace local funds that would, in the absence of federal aid, be available or forthcoming for programs. Instead, grant funds must be used to increase the total amount of funds. In other words, a grant subrecipient may not use federal grant funds to pay for programs that the subrecipient is already obligated to pay, has already budgeted for, or was previously funded with local funds.

The MSP/EMHSD carefully reviews for supplanting issues and concerns in the application review phase, in subsequent monitoring, and in the audit phase. The subrecipient (local program) may be required to supply documentation certifying that they did not reduce non-federal funds because of receiving federal funds. These federal funds may not be used to support the hiring of sworn public safety officers or to supplant traditional public safety positions

and responsibilities. Federal funds cannot be used to replace a reduction in non-federal funds or to solve budget shortfalls in general fund programs.

6. Work Agreement and Quarterly Reporting

6.1 Purpose of Annual Work Agreement

The annual work agreement is a tool to assist local emergency management programs in working toward the jurisdiction's identified goals and to satisfy the State of Michigan's need to ensure that an effective emergency management system exists throughout the State. An acceptable and approved work agreement is required for a local jurisdiction to be eligible for EMPG funds.

6.2 Work Agreement Workgroup

An EMPG workgroup will meet each year to discuss and update the upcoming EMPG work agreement details. The workgroup consists of representatives from each emergency management district, and the MSP/EMHSD subject matter experts. The work group will make final recommendations to the MSP/EMHSD Commander regarding the work agreement before it is distributed to each district through a scheduled EMPG roll-out; this process may be subject to change.

6.3 Work Agreement Items

EMHSD-031 LEMP Work Agreement/Quarterly Report contains program objectives, planned activities, and actions taken. These are described below:

1. Objectives: The objectives listed in the EMHSD-031 are based on the standards listed in EMHSD Pub 206: Local Emergency Management Standards (Published November 2014). A general description of the objective is provided in the EMPG work agreement and listed in Section 4.1 (A) (1-13) of this guidebook.
2. Planned Activities: Activities are identified for each objective listed in the EMPG work agreement. Planned activities are measurable tasks that help the local emergency management program meet each objective.
3. Actions Taken: Each program will indicate whether they have completed the planned activity; this is recorded in the "Actions Taken" section for each quarter of the work agreement.

6.4 Quarterly Reporting

The EMHSD-031 LEMP Work Agreement/Quarterly Report functions as both the work agreement and quarterly progress report. The report must be submitted to the MSP/EMHSD each quarter via an MSP/EMHSD electronic reporting platform[9]. The DC will review the survey results, add comments, and if progress is adequate, will approve the submitted EMHSD-031.

Local grant funding is dependent upon timely completion of work items. Failure to complete work items may result in a delay in that quarter's funding until the work item is completed. The

[9] Details on the submission process are provided to the Local EM as part of the work agreement.

inability to complete a work item should be discussed with the DC as soon as possible to resolve any potential funding delays.

Local program reimbursement involves submitting billing information via the EMHSD-007 EMPG Quarterly Billing form, along with the EMHSD-031, at the end of each quarter. All eligible salary and fringe benefit costs associated with the position of the EM should be included in the quarterly billing forms.

6.5 Procedure for Quarterly Reporting of Local Program Performance

Each MSP/EMHSD DC is responsible for reviewing quarterly work activity reports received from each of the local emergency management programs within their district to determine if a program qualifies for expense reimbursement for the quarter; this process will be done through an electronic reporting platform. After a local program completes the report, the DC will review the submitted information, provide comments, and approve the submission or request revisions from the EM program.

If there are any discrepancies or any insufficient justifications in the local program performance or documentation that could result in funds being withheld, the DC must provide a narrative explanation following review of the EMPG quarterly report. The DC can recommend that support is sustained, explain any recommended delay, or explain forfeiture actions and notify the MSP/EMHSD Risk Reduction and Recovery Section. The State and Local Support Section Commander will provide additional comments and may contact the DC if additional information is necessary to make a just determination regarding any sanctions or corrective actions that the DC requests.

If an appropriate explanation exists, the DC will work directly with the local program to provide the necessary justification or supporting documentation and will provide comments and/or a narrative description to the State and Local Support Section Commander and the Risk Reduction and Recovery Section.

The DC reporting process if additional information is needed:

1. Report a qualified recommendation to proceed with the current quarterly reimbursement payment.
2. Follow up during the next quarter to determine if the situation has been satisfactorily rectified.

6.6 Local Budget for EMPG, EMHSD-017

Each FY, the applicant must also complete EMHSD-017 and submit the form to the appropriate MSP/EMHSD DC for their respective district. The form requires information about the EM's salary and fringe benefits package. Additional information regarding the local budget can be found in Section 2.1.

7. Delay and Forfeiture Policy

7.1 Forfeiture Policy

The MSP/EMHSD has the responsibility and authority to ensure that federal funds are effectively utilized to provide comprehensive and functioning emergency management programs

throughout the state. If a local program fails to meet program requirements, the MSP/EMHSD has the authority to delay and/or forfeit the federal program payments that the state passes through to the local program.

7.2 Program Merit Sanctions

If any of the following categories of the program have noncompliance or unsatisfactory performance or conduct occur, the MSP/EMHSD may impose sanctions on the program.

1. A program that lacks an appointed an EMC or local EM for more than three consecutive months.
2. A program that does not complete annual qualifying and required exercises within the grant period.
3. A program that has not completed required planning activities.
4. A program that fails to complete planned activities outlined in the first, second, third, and fourth quarters of the EMHSD-031 LEMP Work Agreement/Quarterly Report.
5. A program that fails to complete and submit quarterly reporting requirements.
6. A program that fails to complete other work items over a long-term or on a continuing basis.
7. A program that fails to maintain a current and adequate EOP.

7.3 Sanctions That May Be Imposed

The following measures are actions that may be taken in response to program noncompliance, unsatisfactory performance, or conduct:

1. Granting an extension of time to complete work items if appropriate justification exists and is recommended by the DC.
2. Granting an extension of time to complete work items of high-level importance (planning and exercising), if approved by the MSP/EMHSD Commander. The DCs are responsible for recommending the length of such an extension.
3. Withholding payments until each quarter's work items have been satisfactorily completed. The length of payment delay would be recommended by the DC and approved by the MSP/EMHSD Commander.
4. Forfeiting of payment if mandatory work items that affect the basic functioning of the program have not been completed within two quarters, or by the end of the FY, depending on which occurs first, and decided by the MSP/EMHSD Commander.
5. Forfeiting of payment if a qualifying exercise has not been completed and the DC recommends this penalty. Payment would be forfeited for the FY in which the exercise was scheduled, and all subsequent FY, until a qualifying exercise is completed.

8. State Appeals Process

A subrecipient that questions the appropriateness of state actions on its subgrant award, based upon state and federal regulations and guidance, may submit an appeal, together with all available and pertinent documentation, through the MSP/EMHSD Commander to the Director of MSP within 30 days of receiving a notification of action. Upon receipt of such an appeal, the MSP/EMHSD Commander shall forward the appeal and any accompanying documentation to the MSP Director for review and determination. The appeal shall contain all exceptions being taken by the subrecipient; no partial exceptions will be reviewed.

The subrecipient will be notified in writing of the Director's decision, including a statement of the reasons for the determination. This decision shall be final at the state level. No portion of the appellant subrecipient's allocation shall be reallocated by the state, pending determination of its appeal to the Director.

9. Records, Retention, and Availability

All EMPG-related records must be retained for three years after the date that the final federal grant report is filed by the MSP/EMHSD, for purposes of federal or state examination and audit. Each local emergency management program must retain all financial records, supporting documents, statistical records, and all other records pertinent to the EMPG-funded program.

10. Single Audit Requirements

In accordance with the Single Audit Act of 1984, as amended, a non-federal entity that expends

$1,000,000 or more during the non-federal entity's FY in all federal awards combined shall have a single or program-specific audit conducted for that year, in compliance with 2 CFR 200, Subpart F. Non-federal entity means a state, local government, or non-profit organization. The non-federal entity is considered the entire government of the county, city, or township, not just the emergency management program.

2 CFR 200.515(d) Each subrecipient that receives State of Michigan pass-through EMPG funds shall annually submit the Audit Certification EMHSD-053 form with its signed grant agreement, to notify the MSP/EMHSD whether it expects to be required to have a single audit for the next grant period. If an audit is required, the subrecipient is required to submit a copy of the annual audit report to:

Michigan State Police, Emergency Management and Homeland Security Division at MSP-EMHSD-Audit@michigan.gov.

11. On-site Program Reviews

The purpose of an on-site program review is to ensure that local programs are compliant with federal and state requirements and grant guidance. The on-site review focuses on monitoring and helping the local EM understand and comply with all requirements of the grant and work agreements. The on-site review is a separate process administered by MSP/EMHSD and is not intended to duplicate or replace the activities performed by a single audit.

12. EMPG Grant Process Cycle - Application and Reporting

Application		
Timeframe	**Responsible Party**	**Action**
July through August, before the FY begins.	MPS/EMHSD	Distribute relevant grant forms for current FY. Communicate any significant changes.
July through September, before the FY begins.	Local Emergency Management Programs	Submit application documents for each federally funded employee to MSP/EMHSD DCs: • EMHSD-031 • EMHSD-017 • Current position description, resume, and biography. • Executive Compensation (submitted online)
By October 1, beginning of the state FY.	MSP/EMHSD DCs	Review applications and send to MSP/EMHSD Financial Management and Audit Section.

Reporting		
Timeframe	**Responsible Party**	**Action**
Within 20 days following the end of each quarter.	Local Emergency Management Programs	Submit quarterly work reports and billing forms to MSP/EMHSD DCs: • EMHSD-031 • EMHSD-065 • EMHSD-007
Last ten days of the month following the end of each quarter.	MSP/EMHSD DCs	Review reports, make recommendations regarding deficiencies, and report any deficiencies to the State and Local Services Section (SLSS) manager; SLSS manager should provide details to the Preparedness Grants Unit Manager and EMPG Coordinator.
Review upon receipt of submission.	MSP/EMHSD DC's and MSP/EMHSD Financial Management and Audit Section	Review reimbursement submissions.
As soon as Single Audit information has been completed by independent auditing firm.	Local Emergency Management Programs	Submit copies of Single Audit to MSP/EMHSD Audit Unit MSP-EMHSD-Audit@michigan.gov
For three years after the final report is submitted to DHS.	MSP/EMHSD Risk Reduction and Recovery Section, Financial Management and Audit Section, and the Local Emergency Management Programs	Retain EMPG documentation.

EMPG FY CYCLE OVERVIEW

Current Fiscal Year (FY-A EMPG)				New FY (FY-B)
Quarter 1 Oct 1 - Dec 31	Quarter 2 Jan 1 - Mar 31	Quarter 3 Apr 1 - Jun 30	Quarter 4 Jul 1 - Sept 30	Q1 Oct 1 - Dec 31
Due by Oct 1: LEMP EMHSD-017 Current PD, Resume, Bio Exec. Comp.	Q1 Forms: EMHSD-031 EMHSD-065 EMHSD-007	Q2 Forms: EMHSD-031 EMHSD-065 EMHSD-007	EMD-006 Q3 Forms: EMHSD-031 EMHSD-065 EMHSD-007	Q4 Forms (FY A): EMHSD-031 EMHSD-065 EMHSD-007

Quarterly Reporting / New FY Overlap

Online Survey
- EMHSD-031

Training and Exercise
- EMHSD-065

DC
- EMHSD-007

New FY (FY-B) Q1

To DC (then to Ms. Amanda Lung):
- Local Emergency Management Program Work Agreement (LEMP) EMHSD-031, pg. 1
- EMHSD-17
- Position Description, Resume, Bio
- Executive Compensation

New/Next Fiscal Year (FY-B EMPG)			
Quarter 1 Oct 1 - Dec 31	Quarter 2 Jan 1 - Mar 31	Quarter 3 Apr 1 - Jun 30	Quarter 4 Jul 1 - Sept 30
Due by Oct 1: LEMP EMHSD-017 Current PD, Resume, Bio Exec. Comp.	Q1 Forms: EMHSD-031 EMHSD-065 EMHSD-007	Q2 Forms: EMHSD-031 EMHSD-065 EMHSD-007	EMD-006 Q3 Forms: EMHSD-031 EMHSD-065 EMHSD-007