



# State of Montana FY 2025 EMPG Programmatic and Financial Frequently Asked Questions

## Where can I find information regarding the EMPG program?

Here is a list of valuable resources to learn more about EMPG:

- EMPG State Grant Guidance and Notice of Funding Opportunity (NOFO) – found at: <https://des.mt.gov/Grant-Programs/EMPG/EMPG-Resources>
- 2 CFR Part 200 – found at: [https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\\_main\\_02.tpl](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl)
- MT DES Preparedness Program Team

## Who is the Preparedness Program Team?

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## What forms are due when?

EMPG applications are typically due to MT DES the first week of April. The AmpliFund application will be open in mid-January.

Status reports and reimbursement claims/payment requests submitted:

- Status reports are due by the 10th day after the end of each quarter.
- Payment requests are due no later than 45 calendar days after the end of each quarter.

| Reporting Period        | Status Report Due Date | Payment Request Due Date |
|-------------------------|------------------------|--------------------------|
| July 1 – September 30   | October 10             | November 15              |
| October 1 – December 31 | January 10             | February 15              |
| January 1 – March 31    | April 10               | May 15                   |
| April 1 – June 30       | July 10                | August 15                |

- Accruals are due the second week of June. Reference page 6 of this document for more information on the accrual process.
- The Closeout Request Letter is due October 1<sup>st</sup>.

## What is the period of performance (POP) for the EMPG grant?

The period of performance is the window of time in which all grant expenditures must be expended. The EMPG grant POP in the state of Montana is July 1, 2025 – June 30, 2026. All expenditures associated with the grant award must be made within the associated time frame. Any expenditures made outside the period of performance are not eligible for that year's grant.

## What is comingling of funds and is it allowable?

Comingling of subrecipient funds is not allowable per Federal regulations. Comingling is the mixing or blending of funds within a financial accounting system in such a way that expenditures cannot be identified or reconciled to a particular subrecipient, project, grant, or indirect activity. Subrecipients must utilize financial systems which provide accountability for all funds. This generally entails the use of separate accounts established for the specific oversight and expenditure documentation of EMPG grant funds as established within the subrecipient's jurisdictional financial policies and procedures, or other established guidelines as approved.



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## EMPG REQUIREMENTS

### What requirements do EMPG funded subrecipients have to meet?

The elements listed below are the **minimum** requirements for participation in the EMPG program, as found in the EMPG NOFO and State Guidance.

- Participate in the Local Emergency Planning Committee (LEPC) / Tribal Emergency Planning Committee (TERC), or other all-hazards community planning group(s).
- Complete the LEPC survey to the State Emergency Response Commission (SERC) through MT DES. This survey is typically sent out by the end of first quarter each year.
- Support the LEPC/TERC in reviewing and updating a Hazardous Material Response Plan.
- Complete a THIRA/SPR by the advertised due date each year.
- Develop, maintain, and make available upon request, a resource list of people and equipment from the public for use in the event of an emergency or disaster.
- Identify facilities or locations that are designated for emergency use, including a primary and an alternate EOC.
- An EOP is considered current if it has been approved within the last 5 years. Subrecipients must review their EOP every 2 years or when there is a change of elected officials.
- Review and update a Distribution Management Plan. This plan should follow FEMA's *IS-26 Guide to Points of Distribution* course and guidance within including a point of distribution. Subrecipients shall review, update, and submit a Distribution Management Plan to MT DES by June 30th to be included in the state's annual Distribution Plan update submitted to FEMA.
- Annually develop and submit a workplan that identifies the priorities for which EMPG funds will be used and make every effort to follow and accomplish the goals identified.
- A minimum of one exercise a year is required. An exercise should focus on one of the priorities identified in the workplan. The exercise will be conducted during the grant period of performance. The exercise must be followed up with an After-Action Review (AAR) and a corresponding Improvement Plan (IP) that is submitted to the District Field Officer and to [mtdesprep@mt.gov](mailto:mtdesprep@mt.gov) within 90 days of completion. The IP may be used in future workplan development or changes. In some cases, it is acceptable to use a real-



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world event to meet the one exercise requirement, see EMPG State Guidance document for additional requirements.

- All EMPG funded personnel must complete all requisite National Incident Management System (NIMS) courses as determined by FEMA. The following NIMS/Professional Development Series (PDS) courses must be completed within three years of hire: **FEMA IS100, IS200, IS700 and IS800. FEMA PDS: FEMA IS120, IS/G230, IS/G235, IS240, IS241, IS242, and IS244.**
- It is a requirement to attend at least one MT DES sponsored event during the grant's period of performance. A MT DES sponsored event should include content that enhances your emergency management program. Some examples include the emergency management forum, regional meetings and district meetings. Although not sponsored by MT DES, MEMA and MACo do meet this requirement. Please reach out to your DFO to verify other qualifying events.
- Must have a locally written procurement policy that follows 2 CFR 200.318 through 200.326 (Procurement Standards). Note: the most stringent local, state, or federal procurement requirements, procedures, laws, and/or regulations must be used.
- Subrecipients are responsible for the maintenance, storage, and accuracy of all pertinent documentation (files, correspondence, modifications, records, reports, and expenditures, etc.) having to do with their EMPG program.
- Participate in monitoring visit with DFO and grant coordinator as required.

## **What are other activities EMPG subrecipients should work on?**

Elements listed below are some of the other eligible EMPG activities that subrecipients should highly consider working on.

- Creating and updating the following (not an all-inclusive list) recommended plans: Continuity of Operations Plan (COOP), Continuity of Government Plan (COG), Information Management Plan and Processes, Public Information and Warning, Donations Management Plan, Volunteer Management Plan, Debris Management Plan, Identification and Inclusion of Critical Infrastructure, Recovery Related Plans and Procedures, Multi-Hazard Mitigation Plan.
- Testing any public information and warning systems the jurisdiction currently uses.
- Provide emergency and disaster coordination.



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- Please note “responding” to an emergency or disaster is not eligible. Only coordination efforts are eligible.
- Assist in the development of public awareness programs regarding disaster preparedness.

## ALLOWABLE EXPENDITURES

### PLANNING:

#### Can I use EMPG funds to develop or enhance emergency management planning activities?

Yes. Planning spans all five National Preparedness Goal mission areas of prevention, protection, mitigation, response, and recovery. During the application process each subrecipient is required to fill out an EMPG Workplan that acts as a guide to fulfilling EMPG baseline requirements as well as recommended activities to enhance their emergency management program.

### ORGANIZATION COSTS:

#### What are organization costs?

Organization costs are for EMPG eligible personnel and are broken into two categories including salary and fringe.

- Organization Salary (salary, overtime, compensatory time off) may be claimed for EMPG operations, staffing and daily activities that support emergency management principles.
- Organization Fringe includes personnel benefits (health, unemployment, retirement, etc.) provided by the entity which employs any EMPG eligible personnel.

#### What are operational utility costs?

Operational utility costs are related to the EMPG workspace or EOC and includes land line phones, cell phones, internet, rent, and utilities.



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## **TRAVEL:**

### **What are the required criteria for authorized travel/reimbursement?**

To be eligible for reimbursement under the EMPG program, travel must meet the following criteria:

- Must be official business related to approved training, exercise activities and/or linked to accomplishing activities outlined in the EMPG program work plan.
- Must be verifiable, allowable, allocable, and reasonable and may include airfare, mileage, per diem and hotel.
- Abide by the local/state travel policy. Note: reimbursement may not exceed federal per diem rates. For reference, the State of Montana Travel Policy can be found at the provided link: <http://doa.mt.gov/employee-travel>.

Travel reimbursement payment requests must include the below documentation:

- General ledger/financial report for hard expenses (hotel, per diem, airfare, etc.) – required to show a description of the expense (must be able to be tied back to an eligible activity).
- Receipts or county reimbursement form (if applicable).
- Mileage log showing name of person traveling, date of travel, reason for travel, destination, and total number of miles.
- Event agenda or justification.

## **TRAINING AND EXERCISES:**

### **Can I use EMPG funds for training and exercise-related costs?**

Yes. EMPG funds can be used to:

- Design, develop, and conduct trainings and HSEEP exercises.
- Fund travel (e.g., airfare, mileage, per diem and hotel).
- Hire qualified staff, contractors, and consultants to help provide services that correspond with the associated work plan.
- Assist with instructor (re)certification.
- Support other expenditures (e.g., limited items consumed in direct support of exercise activities (i.e., venue rentals for planning and conducting exercises, equipment rentals, and procurement of essential nondurable goods).



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## **Are food purchases allowable under the EMPG grant?**

Yes, but very limited. Working lunches and light refreshments are allowable when provided for meetings, trainings and exercises that are directly related to the EMPG program and exceed a 4-hour period (2 hours prior to lunch and 2 hours following). For questions regarding food purchases, please contact a MT DES Preparedness Grant Coordinator prior to submitting the payment request.

## **SUPPLIES, ACCOUNTABLE SUPPLIES, AND EQUIPMENT:**

### **What is the difference between supplies, accountable supplies, and equipment?**

- Supplies are items that cost less than \$5,000.00 are expended or consumed during daily business, trainings, planning, etc. Supplies are expendable and typically have less than a one-year lifespan. Supplies would be pens, paper, printer ink, etc.
- Accountable Supplies are expendable, cost less than \$5,000 and typically have a lifespan of greater than one year. Accountable supplies would be computers, printers, phones, etc. IT software may be allowable with proper justification.
- Equipment are items that cost more than \$5,000.00 and typically have a lifespan of greater than one year.

### **Is equipment allowable under EMPG?**

Equipment purchases with the standard EMPG funds may be allowable after consulting with MT DES grants staff and pre-approval is obtained. Reverted funds may also be available for equipment and may be awarded if applied for. All equipment purchases must be reasonable, allocable, allowable, and necessary to accomplishing the project identified in the jurisdiction's workplan or reverted funds application and designated to be used only for the EOC. Reverted funds applications open in May and close in June.

### **Can I buy a vehicle or radios with EMPG funds?**

Vehicles are not allowable under the standard EMPG program. However, if reverted funds are available jurisdictions may apply under EMPG's Reverted Funds Special Project.

Radios are allowable under the standard EMPG program but are only eligible for reimbursement if pre-approved and purchased for use by the DES Coordinator and/or Deputy. Radios must be included in the subrecipients work plan prior to purchase and would fall under the "accountable



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supply” budget category as long as each radio is \$5,000.00 or less. It is encouraged to request radios through the EMPG Reverted Funds Special Project application. Subrecipients may not use any FEMA funds to procure or obtain radios that are China made or China affiliated. Please reach out to a MT DES Preparedness Grant Coordinator for guidance.

## **What budget category do computers fall under?**

Personal computers and laptops are not considered equipment and should be claimed under accountable supplies.

## **Are membership dues and newspaper notices for LEPC meetings allowable?**

Yes. Membership dues, such as MEMA and newspaper notices for LEPC meetings, are allowable and can be claimed under the supplies budget category.

## **Are burn permit renewals allowable?**

No. Costs to renew burn permits are not allowable under EMPG as they are not a necessary expense for the emergency management program.

## **Are promotional items allowable?**

No. Promotional items such as shirts, hats, water bottles, stress balls, etc. are not an allowable expense as they are not a necessary expense for the emergency management program.

## **CONSTRUCTION AND RENOVATION:**

### **Are construction and renovation projects allowable under EMPG?**

Construction and renovation projects are not allowable under EMPG due to the short one-year period of performance timeframe and need to do an Environmental Historic Preservation (EHP).

## **GRANT MODIFICATIONS**

### **Can I request a grant amendment during the period of performance?**

Yes. Please contact your MT DES Preparedness Grant Coordinator for assistance. Amendments may be submitted for:

- Unanticipated costs that were not incorporated into the budget at the time of the application.





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- Project goals or expected workplan outcomes changed as milestones were completed.
- Change of authorized official or key personnel, including any reduction or increase in time or salary, as well as other significant personnel changes.

## **How do I submit a grant amendment request?**

Subrecipients should email their Grant Coordinator the budget modification request on the current year's Amendment Request Form. The request must include a justification for the requested revisions, and a change of scope request, if applicable.

## **How soon will I hear back from MT DES on amendment requests?**

An approved request results in a modification to the award documentation. MT DES reviews requests and notifies subrecipients of approval of modifications within 30 days.

## **ACCRUAL PROCESS**

### **What is an accrual, and do I need to do one?**

An accrual, as found in the Montana Operations Manual, is the recognition of expenditure activity prior to its actual receipt or disbursement. EMPG Subrecipients with remaining grant funds are required to submit accruals annually to MT DES no later than the second week of June. MT DES will provide each jurisdiction with an accrual form detailing the remaining EMPG funds prior to the June deadline.

Valid accruable expenditures include:

- Services, supplies, and equipment received on or before June 30th but not yet reimbursed by MT DES
- Payroll costs for time worked up through June 30th but not yet reimbursed by MT DES

## **MONITORING VISITS**

### **Will I be monitored this year?**

Yes, all subrecipients will be monitored. At minimum, monitoring visits will be conducted by MT DES at least once every two years. Monitoring visits are conducted on-site at the office of



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the subrecipient. If an on-site visit cannot be scheduled then it may be ask that monitoring be performed over the phone or through video conferencing.

## **Why are monitoring visits performed?**

MT DES conducts monitoring visits with subrecipients to ensure compliance with the EMPG program guidance.

## **What happens during a monitoring visit?**

Monitoring visits provide the opportunity for questions to be asked, best practices to be shared, and concerns to be addressed. Also, for review of programmatic forms and discussion of program requirements as outlined in the grant guidance; to discuss possible modifications, to provide new personnel with an overview of the grant requirements, and/or provide any additional support to grants staff as needed. During the visit, a formal monitoring review form is used to ask various programmatic, financial, performance, compliance and administrative processes, policies, activities questions.

## **SOFT MATCH (IN-KIND MATCH)**

### **What constitutes soft match?**

Soft match is in-kind match for donated time and travel for non-federally funded personnel for LEPC meetings, trainings and exercises that are specific to the EMPG program and outlined in the work plan. Subrecipients must provide supporting documentation with payment requests in AmpliFund that include both a soft match tracker, sign-in roster, and agenda for all events claiming soft match. For additional guidance contact a MT DES grant coordinator.

### **Who is eligible to claim soft match?**

Only non-federally funded personnel may be claimed under soft match. The only exception to this is that federally funded elected officials may be included under soft match for attending LEPC meetings.



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## **What is the reimbursement rate for time and travel?**

Volunteer rate is typically adjusted in April of each year. To find the most current volunteer rate follow the provided link:

<https://independentsector.org/resource/value-of-volunteer-time/>

Mileage rate is updated in January of each year by the IRS, effective the third quarter of the given grant year. To find the most current mileage rate follow the provided link:

<https://www.irs.gov/tax-professionals/standard-mileage-rates>