



# State of Montana FY2021 SHSP Frequently Asked Questions

## Where can I find info regarding the State Homeland Security Program (SHSP)?

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

- SHSP State Grant Guidance and Notice of Funding Opportunity (NOFO) – found at <https://des.mt.gov/Grant-Programs/SHSP/SHSP-Resource-Docs>
- 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)
- Your District Grant Coordinator

## Who is the Grant Coordinator for my district?

Western District:

Justin Webster

[justin.webster@mt.gov](mailto:justin.webster@mt.gov)

(406)417-9352

Central District:

Jamie Mortimore

[jamie.mortimore@mt.gov](mailto:jamie.mortimore@mt.gov)

(406)202-4835

Eastern District:

Amanda Avard

[amanda.avard@mt.gov](mailto:amanda.avard@mt.gov)

(406)202-4195

## What forms are due when?

**SHSP applications** are typically due to MT DES on or about the first week of March. The Amplifund application will be open on or about the first week of January.

**Nationwide Cybersecurity Review (NCSR)** If your Homeland Security Project is Awarded, this is to be completed after award and is due in December. Reference page 3 and 4 of this document for more information on the NCSR process.

## Performance Plan Reports and Payment Requests submitted:

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



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**Accruals** are due the second week of June. Reference page 6 of this document for more information on the accrual process.

**Closeout Letter** is due once project is complete and final report and claim have been submitted.

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

The period of performance is the window of time in which all grant expenditures must be expended. The SHSP grant POP for sub-recipients in the state of Montana is October 1 – September 30. All expenditures associated with your 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.

## **ENVIRONMENTAL HISTORIC PRESERVATION (EHP) REVIEW**

#### **When is an EHP review required?**

An EHP review is required for projects that have the potential to affect the environment and/or historic properties. Listed are some examples of projects that always require an EHP review:

- Modification or renovation of existing buildings or structures (cameras, generators, access controls, etc.). This applies to historic and non-historic structures.
- Physical security enhancements both interior and exterior (doors, lights, fences, etc.)
- Construction or modification of communication towers (adding antennas, mounting equipment or shelters)
- All activities that cause ground disturbance
  - Ground disturbance is anything that breaks the ground or changes the condition of the grounds surface such as installation of a concrete pad, installation of a fence post and trenching for utilities.
  - Some trainings and exercises create ground disturbance such as vehicle or equipment movement, heavy foot traffic, trenching or hole excavation and explosives.

#### **How long does the EHP process take?**

It truly depends on the project and how quickly sub-recipients complete their EHP screening form. It can take subrecipients anywhere from 2 weeks to 2 months to complete the EHP screening form and submit it to MT DES. MT DES suggests sub-recipients complete and submit the EHP screening form to their Grant Coordinator within 3 months after the grant award. At that



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point your Grant Coordinator will submit the EHP review to FEMA. Expect an additional one to three months before the formal approval letter is received from FEMA, pending FEMA has no further questions. Your Grant Coordinator will let you know when the EHP has been approved and provide you with a copy of FEMA's EHP approval letter for your project binder.

#### **Can I start my project before the EHP review is approved from FEMA?**

No, the EHP review must be completed and approved by FEMA before project initiation. Therefore, do not start any part of your project scope until you have the EHP approval letter from FEMA. EHP noncompliance will jeopardize receipt of grant funds which may result in project delay, denial, or de-obligation of funding.

#### **How do I submit an EHP?**

Please contact your Grant Coordinator for guidance. She/he will provide you with all the needed information and pre-established forms for submittal.

## **NATIONWIDE CYBERSECURITY REVIEW (NCSR)**

#### **What is the NCSR?**

The NCSR is a no cost, annual self-assessment that is designed to measure gaps and capabilities of state, local, tribal and territorial (SLTT) governments cybersecurity programs. It is based on the National Institute of Standards and Technology Cybersecurity Framework (NISTCSF). The NCSR is sponsored by the Department of Homeland Security (DHS) and the Multi-State Information Sharing and Analysis Center (MS-ISAC). Using the results of the NCSR, DHS delivers a bi-yearly anonymous summary report to Congress, providing a broad picture of cybersecurity maturity across the SLTT communities.

#### **Is the NCSR required for all SHSP projects?**

The NCSR is required for all SHSP grants awarded in FY2019 and after. Any awards prior to FY2019 are not required to complete the NCSR.

#### **When is the NCSR Due?**

The NCSR is open for sub-recipients from October 1 – December 31. Sub-recipients are required to complete the NCSR by the end of the awarded calendar year to benchmark and measure their progress of improving their cybersecurity posture.



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#### **How do I register and access the NCSR for completion?**

Sub-recipients must register for the NCSR, to do so please visit the following website:

<https://www.cisecurity.org/ms-isac/services/ncsr/>.

Once the sub-recipient has registered, they will receive their credentials through email from [noreply@archer.rsa.com](mailto:noreply@archer.rsa.com).

To access the NCSR portal and complete the review for submission, please visit the following link: <https://grc.archer.rsa.com>. The sub-recipient will then enter their credentials and use the provided instance number: 20244.

#### **I have questions regarding the NCSR, who do I contact?**

You may always reach out to your Grant Coordinator or for additional questions or assistance, email [NCSR@cisecurity.org](mailto:NCSR@cisecurity.org).

## **ALLOWABLE EXPENDITURES**

#### **Can I use SHSP funds to develop or enhance emergency management preparedness and management planning activities?**

Yes, some eligible activities include update of the Threat and Hazard Identification and Risk Assessment (THIRA), Stakeholder Preparedness Review (SPR) and Continuity of Operations Plans (COOP) as well as updating and maintaining a current Emergency Operations Plan (EOP).

#### **Can I use SHSP funds for planning, training and exercise-related costs?**

Yes. SHSP funds can be used to:

- Design, develop, and conduct trainings and exercises.
- Fund travel (e.g. airfare, mileage, per diem and hotel)
- Implement HSEEP principles into exercise program.

#### **What is the difference between Equipment Capital Asset and Accountable Supplies?**

- Capital Asset are single items that cost more than \$5,000.00 and typically have a lifespan of greater than one year. Capital assets would be generators, repeaters, or sirens.



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- Accountable Supplies are expendable, cost less than \$5,000 and typically have a lifespan of greater than one year. Accountable supplies would be portable radios and security cameras.

#### **Can I buy radios with SHSP funds?**

Yes, radios are allowable under the SHSP program. However, please be aware that radios are not a priority project. Therefore, Senior Advisory Committee (SAC) may move radio projects to the bottom of the list when reviewing and prioritizing SHSP applications.

#### **Is China made or affiliated telecommunication equipment/services allowable?**

No, Subrecipients may not use any FEMA funds to procure or obtain China made or China affiliated telecommunication, video surveillance equipment or services. Please reference the System for Award Management (SAM) for a consolidated exclusion list of subsidiaries of telecommunication companies <https://sam.gov/SAM/> or reach out to your Grant Coordinator for guidance.

### **GRANT MODIFICATIONS**

#### **Can I request a grant extension?**

If you anticipate not being able to complete the project by the initial period of performance (POP) end date noted on the signed obligating document, please reach out to your grant coordinator for guidance. Some projects may have additional time for a grant extension to be requested and approved should there be proper justification.

#### **What if the project is not completed by the end of the grant POP?**

SHSP projects must be completed by the end of the POP. Any projects still making purchases or finalizing construction after the POP are no longer eligible for funding. Any reimbursements that had been paid to the sub-recipient may need to be paid back to the state.

#### **Can I request a budget modification?**

Depending on what the budget modification is for it may be allowable. Contact your Grant Coordinator if you anticipate a budget modification.



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#### **What do I need to submit for a budget modification request?**

Contact your Grant Coordinator for guidance and a step by step guide on how to submit a budget modification through the Amplifund system.

#### **Can I request a change of project scope?**

SHSP projects must follow the same project scope from that set forth during the time of award. However, some scope changes can be requested and approved pending proper justification for allowable modifications that still support the original project intent. Contact your Grant Coordinator for additional guidance.

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

An approved request results in a modification to the award documentation. MT DES reviews requests and notifies sub-recipients 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. All sub-recipients are required to submit accruals annually to the SAA no later than the second week of June for review.

#### **What if I don't have anything to accrue?**

An accrual form must be submitted for each grant project even if the accrual amount is zero.

Valid accruable expenditures should include equipment, materials, supplies ordered or purchased prior to July 1<sup>st</sup> but not yet reimbursed for, regardless of when they were paid for.