

# IMPROVING GRANT MANAGEMENT: SAFECOM Recommendations for Public Safety Agencies

## Based on Guidance from the U.S. DHS Inspector General

### INTRODUCTION

Each year, the U.S. Department of Homeland Security (DHS) Office of Inspector General (OIG) audits grantees to monitor compliance with laws, federal regulations, and program guidance. In 2014, the DHS OIG audited grant recipients in 13 states and five territories which received State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI) funds.<sup>1</sup> The OIG report found, in most instances, states and urban areas administered grant programs effectively, efficiently, and in accordance with federal regulations and program guidance; however, in its findings, the DHS OIG identified two major areas for improvement—strategic planning before grants are awarded, and oversight of grant activities.

This document provides an overview of the [Department of Homeland Security \(DHS\) Office of the Inspector General \(OIG\)](#) recommendations for grantees, and recommendations from SAFECOM for public safety grantees. The intent is to establish best practices and methods that enable grantees to effectively report on the impact of the grant and their progress toward targeted communication goals. Grantees should use the information to develop strong proposals and effectively manage grant-funded projects.

### AUDIT FINDINGS

The DHS OIG identified two major areas for improvement -- strategic planning before grants are awarded, and oversight of grant activities. To improve these areas, the DHS OIG recommended grantees perform the following:

- **Strategic Planning**, which should contain broad, long-term goals and corresponding short-term objectives addressing areas of prevention, protection, mitigation, response, and recovery enhancements within the state or urban area. Specifically, the DHS OIG recommended that grantees strengthen or improve upon:

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<sup>1</sup> DHS OIG-14-22: [https://www.oig.dhs.gov/assets/Mgmt/2014/OIG\\_14-22\\_Dec13.pdf](https://www.oig.dhs.gov/assets/Mgmt/2014/OIG_14-22_Dec13.pdf).

- **Risk Assessments** that provide a process for identifying potential hazards and analyzing what could happen if an incident occurs. Done correctly, risk assessments give states a clear view of the variables to which they may be exposed, whether internal or external, retrospective or forward-looking. Once variables are identified, states must monitor and measure threats in relation to the objectives established in the risk assessment.
- **Performance Management** which defines a tangible and measurable target level of performance, over time, against which actual achievement can be compared, including goals expressed as a quantitative standard, value, or rate. Once a risk assessment is completed and target capabilities set, grant applicants should work to specify proposed activities; identify outcomes, impacts, and performance measures for the proposed activities; tie outcomes, impacts, and measures to long-term goals; obtain appropriate evaluation expertise and determine evaluation methods; and develop a data collection plan, including the procedures for implementing the evaluation.
- **Oversight of Grant Activities**, which is the full responsibility of grantees. The grantee assumes accountability for conduct of project activities and is held responsible for meeting federal and state standards in the areas of allocating, obligating, and expending grant funds; monitoring sub-grantee activity; financial management, internal controls, audit, and timely and accurate reporting; and complying with procurement and property management requirements.

## SAFECOM RECOMMENDATIONS FOR PUBLIC SAFETY GRANTEES

DHS OIG’s findings and recommendations provide beneficial guidance for all federal grantees. SAFECOM and the National Council of Statewide Interoperability Coordinators (NCSWIC) worked closely with the DHS Office of Emergency Communications (OEC) to analyze the DHS OIG recommendations and apply them to public safety stakeholders. The intent of this paper is to inform public safety grantees of lessons learned and best practices in grants management, in order to strengthen grant applications, and increase the impact of federal funding on improving emergency communications nationwide. Below are four recommendations for improving grant management, customized for public safety stakeholders.

### Recommendation 1: Align Projects to Strategic Plans

The public safety community has engaged in strategic planning for many years. Since 2008, all 56 states and territories have developed [Statewide Communications Interoperability Plans](#) (SCIP) – stakeholder-driven strategic plans aimed at improving emergency communications.<sup>2</sup> The DHS OIG reported that strategic planning is critical; states can improve strategic planning by developing fully measurable goals and objectives, as well as by conducting capabilities and risk assessments. These recommendations are consistent with the [SAFECOM Guidance on Emergency Communications Grants](#) (*SAFECOM Guidance*), in which grantees are encouraged to align proposed projects to strategic plans and target funding where there is the greatest risk or need. Best practices for grantees planning emergency communications projects include:

#### *Statewide Communication Interoperability Plans*

Stakeholder-driven, multi-jurisdictional, and multi-disciplinary statewide plans that outline and define the current and future vision for communications interoperability within the state or territory. It is a critical strategic planning tool to help states prioritize resources, establish and strengthen governance, identify future technology investments, and address interoperability gaps.

<sup>2</sup> To find your SCIP, contact OEC at [oeq@hq.dhs.gov](mailto:oeq@hq.dhs.gov) or your SWIC at: <http://www.dhs.gov/safecom/contact-information>.

- Review national and statewide strategic plans for emergency communications (e.g., [National Emergency Communications Plan](#), SCIPs)
- Coordinate with statewide governance bodies and Statewide Interoperability Coordinators (SWIC)<sup>3</sup> to document needs, align proposed projects to national and statewide strategic plans, identify funding options, discuss asset sharing, and set strategic goals and measures
- Review requirements in the federal program guidance and consult with the federal granting agency, spectrum authorities, and *SAFECOM Guidance* when developing projects
- Reference alignment to the SCIP in grant applications

## Recommendation 2: Participate in Risk Assessments

DHS OIG wrote that for risk assessments to yield meaningful results, grantees must consider the [Presidential Policy Directive 8 \(PPD-8\): National Preparedness](#), which is the Nation’s approach to preparing for threats and hazards that pose the greatest risk to the security of the United States. Risks include such events as natural disasters, disease pandemics, chemical spills, and other man-made hazards, terrorist attacks, and cyber-attacks. A risk assessment should begin by identifying community-specific threats, and setting targets for each [core capability](#) identified in the [National Preparedness Goal](#), as set forth by PPD-8.

Operational Communications is a core capability and should be considered in the risk assessment process. DHS requires that states and territories complete a Threat and Hazard Identification and Risk Assessment (THIRA) as a condition of grant funding. Developing and updating the THIRA requires active involvement from the whole community to ensure assessments and planning efforts are representative of all needs.

### Threat and Hazard Identification and Risk Assessment

Required by several DHS grants, the THIRA process helps communities understand their threats and hazards and how the impacts may vary according to time of occurrence, season, location, and numerous other community factors. The THIRA process results in whole community-informed capability targets and resource requirements necessary to address anticipated and unanticipated risks.

Thus, public safety stakeholders should be actively engaged in the [THIRA process](#) to convey the impact of various threats and hazards on emergency communications, and the needs of emergency communications users during all hazards. Participation in the THIRA process will ensure that emergency communications needs are known and considered for funding in future years.<sup>4</sup> Best practices for grantees participating in risk assessments include:

- Perform regular analysis, with participation from the whole community, of the state’s strategy in identifying communications gaps, excesses, and deficiencies and preparedness to meet such challenges
- Use the THIRA process to identify communications-specific threats and hazards and set capability targets for each core capability identified in the *National Preparedness Goal* as required in PPD-8
- Ensure updates to THIRA include desired outcomes as required by program guidance
- Participate in the development of their State’s [State Preparedness Report](#)

<sup>3</sup> SWICs provide leadership on interoperability issues in states and territories. For information, see: [NCSWICGovernance@hq.dhs.gov](mailto:NCSWICGovernance@hq.dhs.gov).

<sup>4</sup> The THIRA is submitted by the State Administrative Agency (SAA). For your SAA, see: <http://www.fema.gov/media-library-data/1426254849515-5f5df4ed92d2e90af450afa2d43a5312/SAA>Contact>List>March>2015.pdf>.

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### **Recommendation 3: Develop Strong Performance Measures**

The DHS OIG found that many states and urban areas did not have strong performance measures which, as a result, affected their ability to demonstrate the impact of grant funding. To strengthen performance measures for emergency communications grants, DHS recommends that the public safety community consult the [Communications Interoperability Performance Guide](#). *SAFECOM Guidance* also encourages grantees to use existing documentation and data (e.g., strategic plans, risk assessments) to measure performance and demonstrate how gaps in capabilities will be addressed through the use of grant funding. Best practices for grantees developing performance measures include:

- Develop project and budget milestones to ensure timely completion
- Consider potential impacts of federal or program requirements (e.g., Environmental and Historic Preservation [EHP] for construction projects) on implementation timeline and plan accordingly
- Identify performance measures that demonstrate the impact of funding, including measures at the start of the grant and benchmark measures to gauge progress throughout the project
- Track performance regularly and report the impact of the funds on the improvement of emergency communications

### **Recommendation 4: Provide Oversight of Grant Activities**

Policies, procedures, and guidelines governing federal and state grants are in place to ensure sound accounting and oversight practices and provide consistency in grant administration. Acceptance of a grant establishes a legal obligation on the grantee to use grant funds in accordance with the grant terms and conditions. Best practices for grantees overseeing grant activities include:

- Establish policies and procedures for monitoring project milestones and financial performance
- Identify and train staff to manage financial reporting and programmatic compliance requirements (e.g., fair and competitive procurement process, EHP, and relevant technology standards)
- Ensure proper mechanisms are in place to avoid commingling and supplanting of funds
- Evaluate clearly the ability of sub-grantees to manage federal funding

## **CONCLUSION**

The DHS OIG's recommendations are consistent with best practices in the *SAFECOM Guidance* which is developed by DHS OEC, SAFECOM, and NCSWIC members. The *SAFECOM Guidance* is updated annually to provide current information on emergency communications policies, eligible costs, best practices, and technical standards for state, local, tribal, and territorial grantees investing federal funds in emergency communications projects. Emergency communications leaders and grantees are encouraged to consult *SAFECOM Guidance* when developing grant proposals.

By following DHS OIG and *SAFECOM Guidance* recommendations, grantees will strengthen their applications and increase their chances of receiving federal funding for emergency communications projects. More importantly, these recommendations will ensure that federal funds are targeted where they are most needed and have the greatest impact on response operations.

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## ABOUT SAFECOM AND NCSWIC

[SAFECOM](#) was formed in 2001 after the terrorist attacks of September 11, 2001 as part of the Presidential E-Government Initiative to improve public safety interoperability, allowing emergency responders to communicate effectively before, during, and after emergencies and disasters. SAFECOM's mission is to improve designated emergency response providers' inter-jurisdictional and inter-disciplinary emergency communications interoperability through collaboration with emergency responders across Federal, State, local, tribal, and territorial governments, and international borders. SAFECOM is a public safety stakeholders. SAFECOM's membership includes 70 members representing federal, state, local, and tribal emergency responders, elected and appointed officials, and major intergovernmental and national public safety associations, who provide input on the challenges, needs, and best practices of emergency communications.

The National Council of Statewide Interoperability Coordinators ([NCSWIC](#)) was established in July 2010. The NCSWIC is comprised of Statewide Interoperability Coordinators (SWIC) and their staff from 56 states and territories. NCSWIC assists State and territory interoperability coordinators with promoting the critical importance of interoperable communications and the sharing of best practices to ensure the highest level of interoperable communications across the nation.

This document was developed by the SAFECOM/NCSWIC Funding and Sustainment Committee. This document reflects the expertise of SAFECOM and NCSWIC members, and DHS OEC coordination efforts to share innovative methods, best practices, and lessons learned in funding and sustaining public safety communications systems. The SAFECOM/NCSWIC Funding and Sustainment Committee will continue to seek best practices for emergency communications grantees and share updates as they become available.

For questions on this document, please contact SAFECOM or NCSWIC:

**SAFECOM:** [SAFECOMGovernance@hq.dhs.gov](mailto:SAFECOMGovernance@hq.dhs.gov)

**NCSWIC:** [NCSWICGovernance@hq.dhs.gov](mailto:NCSWICGovernance@hq.dhs.gov)

### Resources

#### [SAFECOM Guidance on Emergency Communications Grants](#)

The SAFECOM Guidance provides information for grantees developing emergency communications projects for federal funding. Decision makers and grantees should read the SAFECOM Guidance, coordinate proposals with the Statewide Interoperability Coordinator, and encourage compliance with the recommendations contained therein. For DHS grants, grantees must comply with the SAFECOM Guidance as a condition of funding.

#### [National Emergency Communications Plan \(NECP\)](#)

The 2014 NECP provides information and guidance to those that plan for, coordinate, invest in, and use operable and interoperable communications for response and recovery operations. The Plan sets forth five strategic goals based on the SAFECOM Interoperability Continuum. Collectively, the NECP goals aim to enhance emergency communications capabilities at all levels of government and across disciplines in coordination with the private sector, non-governmental organizations, and communities across the Nation.

#### [Communications Interoperability Performance Measurement Guide](#)

This guide is designed to help those in public safety planning. Interoperable capabilities have improved in recent years through a multi-dimensional view of the issue, statewide strategic plans across the nation, and a national plan presenting a practical vision. National goals today target practical outcomes and impacts rather than mere means to these ends. This guide addresses current performance measurement efforts and presents a step-by-step process to build a performance management framework, apply it, and use results to refine strategy.

[DHS OIG Annual Report to Congress on States' and Urban Areas' Management of Homeland Security Grant Programs Fiscal Year 2014](#) This report provides detailed audit findings and recommendations as summarized in this paper.