

FY25 SHSP Award, Willowick Police Department

dhmylander@dps.ohio.gov

Fri 7/10/2026 3:14 PM

To: Keith Lawrence <klawrence@cityofwillowick.com>;

Good afternoon, Willowick Police Department

Ohio EMA is pleased to provide you with your agency's FY25 State Homeland Security Program (SHSP) grant award.

The [linked](#) award documents, uploaded to your EMGrants account, include the following:

- FY25 SHSP award letter, grant agreement, and DHS Standard Terms and Conditions
- Assurances and certifications
- FY25 Homeland Security Grant Program Guidance

These are critical documents, so please ensure you thoroughly review each.

Additionally you are required to complete and submit the Subrecipient Information Form [here](#).

Please note: If your project has been identified as either a National Priority Project (NPA) or a Law Enforcement Terrorism Prevention Activity (LETPA), the project has been placed on hold in Ohio EMA's EMGrants system. Projects attributed to either status will remain on hold until FEMA approval. Any projects with regular, non-LETPA statuses may proceed.

Yours truly,

Hank Mylander

Grants Specialist

Ohio Emergency Management Agency

[2855 West Dublin-Granville Road](#)

[Columbus, Ohio 43235](#)

dhmylander@dps.ohio.gov

Desk: (614) 799-3832

The Willowick Police Department SHSP Anti-Terrorism Project

- 1) The city of Willowick police department (WPD) serves a roughly 2.5 square mile lakeside community in northeast Ohio that is located along a major interstate (State Route 2) and the Lake Erie shoreline. Both of these areas have been identified as critical soft targets and potential corridors for the illicit movement of drugs, weapons, and criminal activity as well as terrorism-related activity. The jurisdiction experiences infrastructure vulnerabilities associated with interstate commerce, beachfront recreation, and maritime access. Currently, the WPD lacks sufficient real-time video monitoring, digital evidence management tools, and interoperable sharing capabilities with larger agencies such as the city of Cleveland police department, Ohio State Highway Patrol, Statewide Terrorism Analysis & Crime Center (STACC), and the Northeast Ohio Regional Fusion Center (NEORFC). These limitations hinder proactive detection, threat recognition, and coordinated response to terrorism or violent extremism threats that may cross jurisdictional lines. The city of Willowick police department is seeking to bolster its' current technological capacity through the addition of multiple live streaming and license-plate-reader cameras as well as a corresponding state-of-the-art software package that boasts an improved collection method of vital open source information that has proved necessary in prosecuting complicated cases involving gangs and/or terrorist groups. This project will enhance information sharing, collaboration, and a culture of national preparedness through: The procurement of technology and/or equipment to support surveillance, communications, data analysis, reporting, and suspicious activity monitoring. The addition of PTZ live cameras and license plate reader cameras will boost the Willowick Police Department's real-time surveillance and situational awareness, enabling early detection of suspicious activity and rapid response to potential threats. These tools allow for efficient monitoring of high-traffic or critical areas, tracking of suspect vehicles, and identification of patterns indicative of terrorist planning. Integrating a software package that combines criminal justice data with open-source intelligence would improve threat assessment, streamline investigations, and support interagency collaboration. Together, these technologies enhance the department's ability to prevent, prepare for, mitigate, respond to, and recover from terrorist events.
- 2) The equipment and services included in this project are: Two Pan-Tilt-Zoom (PTZ) live cameras, four License Plate Reader (LPR) cameras, and one software suite. The PTZ cameras are strategically placed in high-traffic, high-crime areas in order to maximize their clear live streaming capabilities. These cameras also boast a 30-day recording window, which is crucial for closing investigations in a timely manner. The LPR cameras are positioned near major intersections and popular ingresses and egresses throughout the city. This allows for advanced detection of criminals and/or criminal activity in the city as well as real-time notification for a faster police response. The city of Willowick

currently controls three LPR cameras. The proposed software package transforms the user experience when searching for a specific vehicle or person across LPR images and live video feeds. Traditionally, a search for a vehicle has been based on a fine set of parameters. Those search parameters only applied to LPR cameras. Now, investigators can search any vehicle description with clean, natural language across both LPR and live video cameras no matter how specific a description may be. This software suite can also assist investigators in solving a string of crimes across multiple geographical locations by establishing common vehicles found during crime windows, and movement patterns of possible suspects. This technology will prove vital in combating drug trafficking, human trafficking, and any possible terrorist activity. It will help investigators make smart decisions while saving time throughout the investigative lifecycle. The Willowick Police Department SHSP Anti-Terrorism Project proposes to procure and deploy this combination of hardware and software in order to:

- Monitor soft targets and high-traffic nodes including highway interchanges, beachfront areas, public facilities, and busy shopping centers.
- Enable instant information and intelligence sharing between this department, Cleveland PD, and neighboring agencies via secure, interoperable systems.
- Integrate with state and federal partners' systems (fusion centers, DHS watchlists, and regional task forces).
- Support rapid video evidence retrieval and analysis to detect, disrupt, and prevent acts of terrorism.

3) What agency/team/region will this service and/or equipment be purchased to support; how will it maintain or increase their capability AND what agency/team/region will be responsible for the maintenance and oversight of this service and/or equipment?

If this project is chosen for funding through the State Homeland Security Grant program, the WPD and community, surrounding local police departments, and northeast Ohio region as a whole will directly benefit from the technological capabilities provided by the cameras and corresponding software platform. The proposed cameras and search engine software offer a real-time force multiplier for the WPD. With cameras poised at all major intersections and roadways, officers will be able to get instant notifications of wanted persons, stolen vehicles, and/or missing persons in their jurisdiction. The search engine software will serve as a one-stop shop for investigators looking to link a suspect with a crime through a single point of data. The benefits do not stop just at the city limits of Willowick, Ohio. One specific agency beyond the

WPD that will also be supported by this project is the U.S. Marshal's Northern Ohio Violent Fugitive Task Force. This task force is a collaborative, district-wide law enforcement effort spearheaded by the U.S. Marshals Service that is dedicated to the pursuit, apprehension, and successful prosecution of violent adult fugitives across the Northern District of Ohio with outstanding state and federal felony warrants. In order to locate these violent fugitives, LPR camera data and open-source information gathering has come in very handy on numerous occasions. Using camera data, the task force has tracked the movement and lifestyle habits of wanted persons in order to assist in establishing accurate locations for the execution of warrant-service raids. The Willowick community and surrounding police departments will also experience added support through the successful funding of this project. The proposed technology has shown to be a great asset to law enforcement through the application of real-time crime alerts, investigative support, and public over-watch. Since officers cannot be in multiple places at once, the addition of "extra eyes" has helped tremendously. Some examples are the tracking of a hit-and-run suspects' movements along a timeline, providing covert surveillance on a public hot spot location, or generating a potential suspect through the use of open-source data gathering paired with criminal justice information. The technology parent company will be responsible for all of the maintenance of the proposed equipment. The oversight of this project will fall under the previously established policy of the WPD.

- 4) Criminal enterprises, trafficking networks, and potential terrorist threats do not adhere to municipal or county boundaries. The deployment of advanced camera surveillance technologies by the WPD provides an interoperable and scalable platform that can be leveraged by multiple neighboring jurisdictions. Through secure networked architecture and cloud-based storage, both the PTZ video streams and license plate reader data can be made accessible to law enforcement agencies in surrounding counties. This proves especially valuable in real-time suspect vehicle tracking across jurisdictions, coordinated monitoring during regional terrorist events or emergencies, and tactical support for inter-county pursuits and/or fugitive operations. This connectivity enables regional law enforcement entities to create a virtual net across multiple ingress/egress points, increasing the odds of suspect interception, reducing investigative lag time, and fostering faster resolution of multi-county incidents. The proposed software platform, which integrates OSINT with criminal justice databases, can interface with existing regional fusion centers and state-level threat assessment systems such as the NEORFC. This means that suspicious activity observed in Willowick can be quickly disseminated to other counties and agencies through real-time alerts or automated bulletins. The proposed PTZ cameras, LPR units, and software platform are modular—meaning individual cities or counties within the Homeland Security region can adopt components incrementally or as a cohesive system. This is ideal for regional adoption because: Smaller agencies can begin with camera systems or software licenses based on available budget, agencies can later scale up with additional hardware or expanded data-sharing capabilities, and standardized equipment reduces compatibility issues across jurisdictions. This modular design ensures that even under-resourced departments

within the region can participate and contribute to the broader homeland security infrastructure. By emphasizing data sharing, standardization, and interagency coordination, this project positions itself as a foundational asset in the region's broader strategy to prevent, detect, and respond to threats—whether criminal, cyber, or terrorist in nature. This initiative exemplifies how localized technology enhancements can drive systemic improvements across the entire homeland security enterprise.

CERTIFICATION AND SIGNATURES

By signing below, authorized representatives of both parties certify that they have read, understand, and agree to comply with all requirements of this Grant Agreement, incorporated documents, and all applicable federal, state, and local laws governing this award. The Subrecipient signatory certifies under penalty of applicable law that all statements and information provided are true, correct, and complete, and that funds will be used solely for authorized purposes.

Ohio EMA Signatory Official

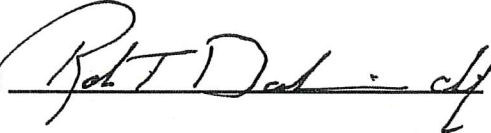
Signature: 

7/10/26

Date: _____

Sima S. Merick
Executive Director
Ohio Emergency Management Agency, State Administrative Agency

Subrecipient Signatory Official

Signature: 

Date: 7-14-2026

Robert Daubenmire
Chief of Police
Willowick Police Department

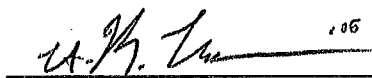
State of Ohio
Ohio Emergency Management Agency
NIMS Compliance Certification Statement

I, Lieutenant Keith Lawrence of the Willowick Police Department. I have reviewed Willowick Police Department's application and supporting documentation to the Ohio Emergency Management Agency for NIMS implementation and compliance with NIMS objectives.

I hereby certify:

- (1) that the Willowick Police Department has sufficient legal authority provided by Willowick Police Department's lawfully enacted or promulgated statutes, ordinances, or regulations to adopt the NIMS requirements;
- (2) that such statutes, ordinances, or regulations are in full force and effect on the date of this certification;
- (3) that the tasks necessary to implement NIMS requirements have been accomplished to the "good faith effort" standard within the Willowick Police Department by all disciplines receiving direct benefit as a result of federal preparedness funding; and
- (4) that Willowick Police Department has reviewed the specific tasks in the FEMA NIMS Implementation Objectives and completed the annual NIMS survey as provided by the Ohio EMA in its grant announcement.

To assist Ohio EMA's review of this application, additional evidence of compliance may be requested and reviewed by Ohio EMA and must be made available upon request. I understand failure to provide the information may result suspended or terminated funding.

 06

Keith Lawrence
Lieutenant

7-14-25

Date

Summary Sheet for Assurances and Certifications

Grant Year: **Federal Fiscal Year 2025**

Grant Program: **SHSP**

This summary sheet includes Assurances and Certifications that must be read, signed, and submitted as a part of the Application for Federal Assistance.

An applicant must check each item that they are certifying to:

- | | | |
|-----------------|-------------------------------------|---|
| Part I | ☒ | SF-424B, Assurances for Non-construction Programs |
| Part II | ☒ | SF-424D, Assurances for Construction Programs |
| Part III | ☒ | GG Lobbying Form, Certification Regarding Lobbying |
| Part IV | ☐ | SF LLL, Disclosure of Lobbying Activities <i>(Only if applicable)</i> |

As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the identified attached assurances and certifications.

Robert Daubenmire, Chief of Police

Typed Name of Authorized Representative

Title

Signature of Authorized Representative

Date Signed



7-18-2026

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET.
SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

1. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
2. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
3. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the

Endangered Species Act of 1973, as amended (P.L. 93- 13- 205).

1. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (Identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Chief of Police
APPLICANT ORGANIZATION Willowick Police Department	DATE SUBMITTED 7-14-2026

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009

Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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1. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
2. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
3. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
4. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
5. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
6. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
7. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
8. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
9. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
10. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Chief of Police
APPLICANT ORGANIZATION Willowick Police Department	DATE SUBMITTED 7-14-26

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

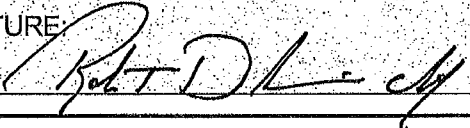
(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

* APPLICANT'S ORGANIZATION Willowick Police Department	
* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE * Name: Robert Daubenmire * Title: Chief of Police	
* SIGNATURE 	* DATE: 7-14-2026

CERTIFICATION REGARDING BORDER-SECURITY COORDINATION, INFORMATION SHARING, AND COOPERATION WITH DHS

Applicable to FY 2025 DHS Standard Terms & Conditions (Issued 18 April 2025)

Subrecipient: Willowick Police Department

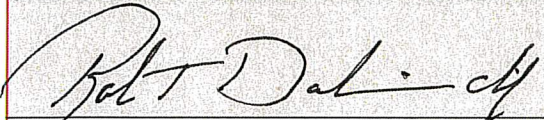
Grant Name: FY25 SHSP

Grant Number: FY2025-SHSP-38

By signing this Assurance, the Subrecipient acknowledges and agrees to comply with the following FY 2025 DHS Standard Terms and Conditions (Article 56 - Compliance with Federal Immigration Law) requirements and certifies under penalty of perjury pursuant to 28 U.S.C. § 1746, that:

1. They will comply with 8 U.S.C. §§ 1373 and 1644 (immigration status information sharing).
2. They will comply with other relevant immigration laws including 8 U.S.C. § 1324(a)(1)(A)(iv) (encouraging or inducing illegal entry), 8 U.S.C. § 1324(a)(1)(A)(ii) (transporting illegal aliens), and 8 U.S.C. § 1324(a)(1)(A)(iii) (harboring, concealing, or shielding illegal aliens);
3. They will honor requests for cooperation including joint operations, sharing of information, and short-term detention pursuant to valid detainers.
4. They will provide access to detainees.
5. They will not leak or publicize immigration enforcement operations.

By signing below, the Subrecipient certifies understanding of and compliance with the FY 2025 DHS Standard Terms & Conditions (Article 56 - Compliance with Federal Immigration Law) and acknowledges that this Assurance is a mandatory condition of receiving SHSP funding passed through by the Ohio Emergency Management Agency.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Chief of Police
APPLICANT ORGANIZATION Willowick Police Department	DATE SUBMITTED 7-14-2026



**Department of
Public Safety**

Emergency Management Agency

ema.ohio.gov
Mike DeWine, Governor Jim Tressel, Lt. Governor Benjamin B. Suver, Director

HOMELAND SECURITY GRANT PROGRAM FY2025 GRANT GUIDANCE

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Introduction

The FY2025 Homeland Security Grant Program (HSGP) plays an important role in the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities essential to achieving the National Preparedness Goal (the Goal) of a secure and resilient Nation. The building, sustainment, and delivery of these core capabilities are not exclusive to any single level of government, organization, or community, but rather, requires the combined effort of the whole community.

The objective of the National Preparedness System is to facilitate an integrated, risk-informed, capabilities-based, whole community approach to preparedness. Complex and far-reaching threats and hazards require the engagement of individuals, families, communities, private and nonprofit sectors, faith-based organizations, and all levels of government.

The FY2025 HSGP supports investments that improve the ability of jurisdictions nationwide to:

- **Prevent** a threatened or an actual act of terrorism;
- **Protect** our citizens, residents, visitors, and assets against the greatest threats and hazards;
- **Mitigate** the loss of life and property by lessening the impact of future catastrophic events;
- **Respond** quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of catastrophic incident; and/or
- **Recover** through a focus on the timely restoration, strengthening, accessibility and revitalization of infrastructure, housing and a sustainable economy, as well as health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident; and do so in a manner that engages the whole community while ensuring the protection of civil rights

Capabilities are the means to accomplish a mission, function, or objective based on the performance of related tasks, under specified conditions, to target levels of performance. The most essential of these capabilities are the core capabilities identified in the National Preparedness Goal. Complex and far-reaching threats and hazards require the whole community to integrate preparedness efforts in order to build, sustain, and deliver the core capabilities and achieve the desired outcomes identified in the National Preparedness Goal. The components of the National Preparedness System provide a consistent and reliable approach to support decision making, resource allocation, and measure progress toward these outcomes. While each of the components of the National Preparedness System is essential to achieve preparedness, it is critical that the components be understood and used in the context of each other. Ultimately, this integrated approach becomes a means to achieve the National Preparedness Goal in a consistent and measurable way.

Key Elements

Homeland Security Grant Program

The HSGP program consists of the following components:

- State Homeland Security Program (SHSP)
- Urban Area Security Initiative (UASI)
- Operation Stonegarden (OPSG)

National Funding Priorities

For FY2025, DHS/FEMA requires a statewide investment (minimum 30% of the total statewide allocation) across the following five identified National Priorities. The National Priority areas include the following:

- Enhancing the Protection of Soft Targets/Crowded Places (no minimum percent)
- Supporting Homeland Security Task Forces and Fusion Centers (no minimum percent)
- Enhancing Cybersecurity (no minimum percent)
- Enhancing Election Security (3% minimum percent)
- Supporting Border Crisis Response and Enforcement (10% minimum percent)

State Funding Priorities

For FY2025, Ohio has invested in the following six priorities:

- Targeted Sustainment of Specialty Teams
- Communications
- Early Warning/Notification
- Exercise
- Planning
- Mass Casualty and Fatality Management

Prohibition of Telecommunications Equipment and Services Covered by Section 2 of the Secure Networks Act

The FCC has published a list of communications equipment and services (Covered List) that are deemed to pose an unacceptable risk to the national security of the United States or the security and safety of United States persons, based exclusively on any of four sources for such a determination and that such equipment or services possess certain capabilities as enumerated in section 2(a) of the Secure and Trusted Communications Networks Act of 2019, Pub. L. No. 116-124, 133 Stat. 158 (2020) (codified as amended at 47 U.S.C. §§ 1601–1609). Equipment and services found on this covered list are not allowable through the SHSP grant program. See Prohibited Telecommunications Equipment and Services under Post Award Requirements below.

Controlled Equipment

FEMA/DHS has reinstituted the Controlled Equipment waiver process for certain types of equipment (drones, armored vehicles, etc.). The requirements have become more extensive and cumbersome. Your assigned Ohio EMA Grants Management Specialist will address the specific requirements if your project is subject to this process.

Changes to Equipment definition

Under 2 CFR§ 200.1, Equipment is now defined as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost of \$10,000 or more. This is an increase from \$5,000 in prior years.

Equipment Disposition and Retention

When equipment is no longer needed for the original project and/or has outlasted its useful life, 2 CFR §200.313(e-f) prescribes new language for disposition and retention. Ohio EMA requires the subrecipient secure approval from Ohio EMA prior to *any* equipment disposition/retention.

Award Information

Issued By

U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA), Grants Program Directorate (GPD) through Ohio Emergency Management Agency as the State Administrative Agency (SAA)

Assistance Listings (AL) Number and Title:

97.067 - Homeland Security Grant Program

Authorizing Authority for Program

Section 2002 of the *Homeland Security Act of 2002* (Pub. L. No. 107-296, as amended), (6 U.S.C. § 603)

Appropriation Authority for Program

Full-Year Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 119-4 § 1101

Period of Performance

The period of performance of this grant will be September 1, 2025 through December 31, 2027. Grant projects must be completed within the timeframe allowed by this guidance. Subrecipient should be aware that as of December 31, 2027, all activities associated with the FY2025 HSGP program must be complete and all equipment purchased with the grant must be received, installed, and in service and cash requests submitted for reimbursement.

Extension of the Performance Period

It is highly unlikely that extensions to the performance period stated above will be granted by the State Administrative Agency (SAA), which is the Executive Director of Ohio EMA. The subrecipient asking for the extension will need to demonstrate something truly beyond the control of the subrecipient in order to be considered for the extension. Subrecipients should consider the unlikely event of an extension when planning project timelines and when doing bids for projects. Federal Procurement guidelines cannot be avoided based on grant timelines.

FY2025 HSGP Funding

As required by the Homeland Security Act of 2002 (Public Law 107–296), Title XX, § 2006, as amended by the 9/11 Act, Title I, §101, August 3, 2007, 121 Stat. 280, 6 U.S.C. § 607, Ohio is required to ensure that at least 35% of funding is dedicated to law enforcement terrorism prevention activities. This requirement has been met by dedicating funding to specific law enforcement grant projects. As the SAA, Ohio EMA is required to obligate at least 80% of funds to local units of government.

Multiple Purpose or Dual-Use of Funds

Many activities that support the achievement of core capabilities related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. However, all HSGP-funded projects must assist recipients and subrecipients in achieving core capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

Grant Administration

The Grant Administration section is intended to help subrecipients in understanding the rules and regulations associated with administering federally funded grant awards and the state's process for meeting these requirements. This comprehensive resource will provide subrecipients with standard financial and administrative processes that will ensure compliance with the preparedness grant programs.

Post Award Requirements

Issuance of Grant Agreement

A grant agreement will be generated and sent to the subrecipient along with any special conditions. This grant agreement must be signed by the official signatory and returned via email (electronic signature is acceptable) to Ohio EMA by September 11, 2026. Any costs incurred prior to issuance of the executed grant agreement, assurances, and official EM Grants budget approval may not be reimbursed. For any funding hold placed on a grant award, no expenditures can be made until the funding hold is released.

Grant Performance Period

The performance period for the FY2025 HSGP will be September 1, 2024 through December 31, 2027. Note that all costs must be incurred within the period of performance to include receipt and installation of all equipment. No funds may be spent on activities or costs that occur outside of the defined grant performance period. Extensions to the grant performance period will only be approved if the subrecipient can provide compelling justification for why the approved projects are incomplete.

Standards for Review

Ohio EMA will identify the applications and amounts approved for funding. The grant award may be a reduced amount from the initial request. Subrecipients of FY2025 HSGP funding are required to provide detailed budgets for the funded projects.

All budget modifications will require prior approval from Ohio EMA Grants Branch staff prior to incurring expenses. Any budget modification made after the purchase of equipment or services will not be reimbursed. Any remaining funds not utilized for the original project must be de-obligated.

Demonstrating Progress

Subrecipients will be held accountable for meeting the milestones listed in the project application. While there will be a level of flexibility extended, obvious or repetitive lack of progress towards completion of grant funded activities may result in de-obligation of funds. Any de-obligated funds will be re-programmed by the state to projects that can be completed within the period of performance.

Standards for Financial Management

Subrecipients are required by 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards to have in place an accounting system that maintains records which

adequately identify the source and application of funds provided for grant funded projects. The accounting system must include information pertaining to sub-grant awards, obligations, un-obligated balances, assets, liabilities, outlays or expenditures and income. Ohio EMA requirements for subrecipient accounting include the ability to track expenditures by grant program and by federal fiscal year of the award (i.e., FY2024 HSGP, FY2025 HSGP, etc.).

Maintenance and Sustainment Costs

The use of DHS/FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable, as described in FEMA Policy FP-205- 402-125-1 under all active and future grant awards unless otherwise noted. With the exception of maintenance plans purchased incidental to the original purchase of equipment, the period covered by maintenance or warranty plan must not exceed the period of performance of the specific grant funds used to purchase the plan or warranty.

As an example of maintenance plan purchased incidental to the original purchase, you may purchase a new piece of equipment and as part of the purchase include the cost of a five-year warranty. Even though the warranty exceeds the period of performance, the warranty will be considered an eligible cost.

Routine upkeep (e.g., gasoline, tire replacement, routine oil changes, monthly inspections, grounds, and facility maintenance, etc.) is not considered a maintenance cost, and as such it is the responsibility of the grantee and may not be funded with preparedness grant funding.

Construction and Renovation (For UASI only)

Use of HSGP funds for construction is generally prohibited and will have limited applicability to Ohio's FY2025 HSGP funding.

Project construction using HSGP funds may not exceed the greater of \$1,000,000 or 15 percent of the grant award. For the purposes of the limitations on funding levels, communications towers are not considered construction.

Written approval must be provided by DHS/FEMA prior to the use of any HSGP funds for construction or renovation. When applying for construction funds, recipients must submit evidence of approved zoning ordinances, architectural plans, and any other locally required planning permits. Additionally, recipients are required to submit a SF-424C form with budget detail citing the project costs.

Recipients using funds for construction projects must comply with the *Davis-Bacon Act* (codified as amended at 40 U.S.C. §§ 3141 *et seq.*). Recipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character like the contract work in the civil subdivision of the State in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor (DOL) wage determinations, is available online at <https://www.dol.gov/whd/govcontracts/dbra.htm>.

28 C.F.R. Part 23 Guidance

DHS/FEMA requires that any information technology system funded or supported by these funds comply with 28 C.F.R Criminal Intelligence Systems Operating Policies if this regulation is determined to be applicable.

Standard Financial Requirements

Any subrecipient(s) accepting grant funds from Ohio EMA shall comply with all applicable laws and regulations outlined here. The administrative requirements that apply to most Department of Homeland Security (DHS) award recipients and specifically the awards made to our governmental partners through the grant program(s) included in this guidance arise from 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

The requirements for allowable costs/cost principles are contained in 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, DHS program legislation, Federal awarding agency regulations, the terms and conditions of the award and the accompanying grant guidance. The applicable costs principles for the grants included in this guidance are:

- 2 CFR 2 Subpart E-Cost Principles
- 48 CFR Part §31.2, Federal Acquisitions Regulations (FAR), Contracts with Commercial Organizations.

The subrecipient is required to ensure that the requirements of the federal grant are met as well as any applicable requirements of the state and local government. Acceptance of a federal grant and its requirements do not relieve the subrecipient of requirements of local and/or state government. In addition, acceptance of federal grant funding means subrecipient Fiscal Agent must comply with and assume financial responsibility for audit findings. You must meet all local, state, and federal guidelines, whichever is stricter.

Environmental Planning and Historic Preservation (EHP) Compliance

FEMA is legally required to consider the potential impacts of all grant-funded projects on environmental resources and historic properties. For HSGP and other preparedness grant programs, this is accomplished via FEMA's Environmental Planning and Historic Preservation (EHP) Review. Subrecipients must comply with all applicable EHP laws, regulations, and Executive Orders (EOs) in order to draw down their FY2025 HSGP grant funds. Any project with the potential to impact natural resources or historic properties cannot be initiated until FEMA has completed the required FEMA EHP review. Grantees that implement projects prior to receiving EHP approval from FEMA risk de-obligation of funds.

Any HSGP projects involving the following require a FEMA EHP review:

- Installation of equipment
- Exercises not specifically excluded from a FEMA EHP review per the GPD Programmatic Environmental Assessment (PEA), See IB 345.
- Ground-disturbing activities,
- New construction - including communication towers,
- Modification/renovation of existing buildings or structures
- Furthermore, for those proposed construction or renovation projects that are part of larger projects funded from a non-FEMA source (such as an EOC that is part of a larger proposed public safety complex), a FEMA EHP review must be complete before the larger project is initiated. For these types of projects, subrecipients must complete the FEMA EHP Screening Form, which is located in EMGrants on the SHSP [tab](#) under General Grant Resources.

The following activities would not require the submission of the FEMA EHP Screening Form:

- planning and development of policies or processes;
- management, administrative or personnel actions;
- classroom-based training;

- table top exercises and;
- acquisition of mobile and portable equipment (not involving installation).

Projects using HSGP funds that were initiated or completed before an EHP review was concluded will be de-obligated. To avoid unnecessary delays in starting a project, grantees are encouraged to pay close attention to the reporting requirements for an EHP review.

Prohibited Telecommunications Equipment and Services

Section 1.50002 of the Commission's rules directs the Public Safety and Homeland Security Bureau to publish a list of communications equipment and services (Covered List) that are deemed to pose an unacceptable risk to the national security of the United States or the security and safety of United States persons, based exclusively on any of four sources for such a determination and that such equipment or services possess certain capabilities as enumerated in section 2(a) of the Secure and Trusted Communications Networks Act of 2019, Pub. L. No. 116-124, 133 Stat. 158 (2020) (codified as amended at 47 U.S.C. §§ 1601–1609). Pursuant to the Commission's rules, the Public Safety and Homeland Security Bureau will maintain this list on the Commission's website, and will monitor the status of any determinations in order to update the Covered List. <https://www.fcc.gov/supplychain/coveredlist>

Procurement

The procurement process is one of, if not, the most scrutinized aspect of the federal grant programs. The emphasis on how procurements are made is based from the 2 CFR200 requirements that "all procurement transactions be conducted in a manner providing full and open competition with the standards of this section (§200.319)". Additionally, subrecipients must ensure that they meet the procurement requirements of the Ohio Revised Code and local procurement regulations. All subrecipients are strongly urged to seek out their procurement department/individual to seek guidance on implementing the grant requirements into the procurement of any grant funded item or service. In accordance with this requirement, subrecipients will be required to document actions that demonstrate compliance with the "full and open" regulation. 2 CFR 200 (§200.320) offers the following guidance in an effort to help sub-recipients navigate the requirements of procurement:

The non-Federal entity must use one of the following methods of procurement:

- **Micro-purchases:** Micro-purchases are defined as the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$10,000 or the local procurement policy, whichever is more stringent. To the extent possible, the non-Federal entity must distribute these purchases equitably among qualified suppliers; micro-purchases may be awarded without soliciting quotes if the price is considered reasonable and the local policy allows for this; in light of the reasonableness requirement Ohio EMA is suggesting subrecipients should still seek quotes where feasible. In order to document that the subrecipient has utilized the strictest of local, state, and federal procurement policies, Ohio EMA will require a copy of the subrecipient's local procurement policy with each cash request.
- **Small Purchase—**price or rate quotations must be obtained from a minimum of three sources if the cost is less than \$79,567.99 and the local policy does not establish a different, lower amount.
- **Procurement by sealed bid (formal advertising)** - Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is lowest in price; consult 2 CFR 200 §200.320(c)(1) as well as local policy to determine what conditions make a sealed bid feasible.

- **Procurement by competitive proposals** - Generally used when conditions are not appropriate for the use of sealed bids; consult 2 CFR 200 §320(d) and local policy to determine the requirements that apply if this type of procurement method is used and must list each of the criteria the selection will be based on.
- **Procurement by noncompetitive proposals** - Will not be approved except in RARE circumstances when it is extremely well documented and only due to inadequate competition. Should you only receive one bid or quote you will need to contact the Grants Branch. Any procurement without 3 quotes or bids must have a pre-approval by Ohio EMA.

Subrecipients should note that the following situations are considered to be restrictive of competition and should be avoided (2 CFR 200 §200.319):

- Placing unreasonable requirements on firms in order for them to qualify to do business,
- Requiring unnecessary experience and excessive bonding,
- Noncompetitive pricing practices between firms or between affiliated companies,
- Noncompetitive awards to consultants that are on retainer contracts,
- Organizational conflicts of interest,
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance of other relevant requirements of the procurement, and
- Any arbitrary action in the procurement process.

Subrecipients must maintain records sufficient to detail the significant history of any procurement. These records will include, but are not necessarily limited to the following: local procurement policy, rationale for the method of procurement, request for quote correspondence, selection of contract type, contractor selection or rejection, and the basis for the contract price. Subrecipients alone will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements.

Pre-Procurement Approval Process

Prior to obligating any grant funds for approved projects, grant subrecipients are required to submit a Procurement Review request through the EM Grants system for approval by Ohio EMA Grants Branch staff. EM Grants details the required documentation that must accompany the submission based on the intended method of procurement. Review and approval will be completed within five business days (unless the submission requires additional information and/or clarification). The Pre-Procurement Approval Process applies to any procurement at/above the Micro-Purchase Threshold (\$10,000 and above).

To provide clarification on several areas of procurement interpretations, the following guidelines will now be required in the procurement process:

- **Micro-Purchase Procurement (<\$10,000)**
 - Subrecipients will need to submit Suspension and Debarment verification documentation with their reimbursement request.
 - Subrecipients may utilize the GSA Schedule as a source for procuring items under the micro-purchase threshold.
- **Small Purchase Procurement (\$10,000 - \$79,567.99)**
 - Subrecipients will need to submit Suspension and Debarment verification documentation with their Procurement Process approval form.
 - A minimum of **three valid quotes** will be required to proceed with procurement. A valid quote is one that meets all specifications of the Request for Quote. If any quote is

deemed ineligible by the subrecipient or Ohio EMA, the subrecipient will be required to send out additional Requests for Quote until they attain the required minimum of three valid quotes.

- Subrecipients may utilize the GSA Schedule as a source for one of their valid quotes.
- **Sealed Bid Procurement (\$79,568 and above)**
 - Subrecipients will need to submit Suspension and Debarment verification documentation with their Procurement Process approval form.
 - A minimum of **two valid bids** will be required to proceed with procurement. A valid bid is one that meets all specifications identified in the Invitation to Bid. If any bid is deemed ineligible by the subrecipient or Ohio EMA, the subrecipient will be required to send out additional Requests for Quote until they attain the required minimum of two valid bids.
 - Subrecipients may **NOT** utilize the GSA Schedule as a source for one of their valid bids.
- **Competitive Proposals (\$79,568 and above)**

*****This is only for use when sealed bidding is not possible as the terms of how a project are to be completed must be negotiated.***

 - Subrecipients will need to submit Suspension and Debarment verification documentation with their Procurement Process approval form.
 - The criteria and weight of all scoring criteria must be very clear in the specifications and must not be restrictive of competition per 2 CFR 200.319.
 - A minimum of **two valid proposals** will be required to proceed with procurement. A valid proposal is one that meets all specifications identified in the Request for Proposals. If any proposal is deemed ineligible by the subrecipient or Ohio EMA, the subrecipient will be required to send out additional Requests for Quote until they attain the required minimum of two valid proposals.
- **Inadequate Competition**

*****This is only for use when the minimum number of quotes, bids, or proposals as specified in the 2 CFR 200 and this guidance are not met.***

 - Subrecipients will need to submit Suspension and Debarment verification documentation with their Procurement Process approval form.
 - Documentation must be provided to demonstrate the effort involved with attempting to competitively solicit price rates.
 - **For Procurements Requiring Quotes:** After a documented effort has been made to achieve three quotes and has not produced three quotes, a subrecipient may then bid the project. The award should then be made to the lowest bidder
 - **For Procurements Requiring Bids:** After the initial Invitation to Bid (ITB) has been solicited and has not produced two valid bids, to document sufficient competitive effort a subrecipient may then solicit a second ITB and award to the lowest cost, qualified bid.
 - **For Procurements Requiring Proposals:** After the initial Request for Proposals (RFP) has been solicited and has not produced two valid proposals, to document sufficient competitive effort a subrecipient may then solicit a second RFP and award to the lowest cost, qualified proposals considering other clear evaluation criteria."

Subrecipients are encouraged to work closely with Ohio EMA Grants Branch Staff throughout the procurement process to address any concerns and ensure compliance with federal, state, and local requirements.

Socioeconomic Contracting Requirements

2 CFR 200.321 lists the requirements for contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.

- (a) When possible, the recipient or subrecipient should ensure that small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms (See U.S. Department of Labor's list) are considered as set forth below.
- (b) Such consideration means:
 - (1) These business types are included on solicitation lists;
 - (2) These business types are solicited whenever they are deemed eligible as potential sources;
 - (3) Dividing procurement transactions into separate procurements to permit maximum participation by these business types;
 - (4) Establishing delivery schedules (for example, the percentage of an order to be delivered by a given date of each month) that encourage participation by these business types;
 - (5) Utilizing organizations such as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
 - (6) Requiring a contractor under a Federal award to apply this section to subcontracts.

Food Costs

With the exception of food costs associated with travel/per-diem or providing for a meal during a full scale exercise where participants do not have the ability to leave, food costs will not be approved. In all cases where food is permitted, costs must be reasonable. Costs will be determined to be reasonable if the per person (documented participants) cost for food is equal to or less than the permitted per diem for the meal provided per the GSA website.

Project Management

Source Documentation

2 CFR Part 200 also requires that accounting records be supported by such source documentation as cancelled checks, paid bills, auditor payroll journals, signed (by employee and supervisor) time and attendance records, contract and sub-grant award documents, etc. As such, Ohio EMA Grants Branch requires that subrecipients have source documentation available prior to requesting cash reimbursement. Proper documentation for select items is as follows but not all inclusive but can be used as a minimum guideline:

- Travel costs
 - Copy of the government unit travel policy. Please specify if employee is being reimbursed directly by Fiscal Agent Jurisdiction or another local agency and their policy
 - Receipts/documentation as required by travel policy
 - Federal Per Diem Policy must be followed unless the jurisdiction reimbursing

employee has outlined their own specific per diems.

- Personnel costs
 - Current official jurisdiction approved position description
 - Time and Effort documentation with activity reports reflecting allowable work and accomplishments as it pertains to the program and outlined in 2 CFR 200.
- Contract costs
 - Procurement Documentation
 - Copy of draft contract for eligibility review prior to contract award
 - Copy of awarded contract for grant file
 - Deliverables and timeline listed in contract
 - Terms of payment outlined in contract
 - For contracts to an individual, a signature of the “contractor” is required.
- Equipment costs
 - Procurement
 - Contracts
 - Invoice (not quote) for equipment purchased
 - Documentation that equipment is received on site and installed as necessary
- Meeting/Conference/Training costs
 - Procurement Documentation
 - Invoices
 - Contracts
 - Agenda/Course Description
 - Attendance roster or Certification (certificate required for training)

Project Changes

Per 2 CFR Part 200, subrecipients must obtain prior approval of the awarding agency (Ohio EMA) in any case where a change is to be made to the scope of the project, regardless of budget impact. Ohio EMA will require all subrecipients to request a budget modification and approval, to include EHP approval, through EM Grants prior to costs being incurred for the item(s) to be changed. Costs incurred prior to appropriate actions being taken to modify and approve the budget may result in costs being denied for reimbursement.

Equipment and Supplies Requirements

Utilization of HSGP funds for equipment purchases requires that subrecipients maintain specific documentation on each item through its useful life until final disposition occurs. Per 2 CFR 200, procedures for managing equipment (including replacement equipment), whether acquired in whole or in part with grant funds, until disposition takes place will, as a minimum, meet the following requirements:

- Property records must be maintained that include (2 CFR 200 §200.313(d) Management requirements):
 - A description of the property,
 - A serial number or other identification number,
 - Source of funding for the property (including CFDA and FAIN)
 - Who holds title,
 - The acquisition date
 - Cost of the property, The source of property,
 - Percentage of Federal participation in the cost of the property,
 - The location of the property,
 - Use and condition of the property, and

- Any ultimate disposition data including the date of disposal and sale price of the property.
- A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.
- Adequate maintenance procedures must be developed to keep the property in good condition.
- If the subrecipient receives authorization from Ohio EMA to sell the property, proper sales procedures must be established to ensure the highest possible return.
- Subrecipients who have purchased equipment with Federal funds must submit an annual inventory certification along with a current Master Asset Listing to the Grants Branch no later than January 31 of each year. The Master Asset Listing must be submitted in electronic format (Excel or .csv). The form is located in EMGrants on the SHSP [tab](#) under General Grant Resources

Equipment Disposition and Retention

*When equipment is no longer needed for the original project and/or has outlasted its useful life, 2 CFR §200.313(e-f) prescribes the following requirements for disposition and retention. **Ohio EMA requires the subrecipient secure approval from Ohio EMA prior to any equipment disposition/retention.***

- With Ohio EMA's prior approval, equipment with a current fair market value of \$10,000 or less (per unit) may be retained, sold, or otherwise disposed of with no further responsibility to the Federal agency or pass-through entity.
- Items of equipment with a current fair market value in excess of \$10,000 (per unit) may be retained or sold by the recipient or subrecipient. However, the Federal agency is entitled to an amount calculated by multiplying the percentage of the Federal agency's contribution towards the original purchase by the current market value or proceeds from the sale. If the equipment is sold, the Federal agency or pass-through entity may permit the recipient or subrecipient to retain, from the Federal share, \$1,000 of the proceeds to cover expenses associated with the selling and handling of the equipment.
- The non-federal entity may transfer title to the property to the Federal Government or to an eligible third party provided that the recipient or subrecipient must be entitled to compensation for its attributable percentage of the current fair market value of the property.
- In cases where a recipient or subrecipient fails to take appropriate disposition actions, the awarding agency may direct the recipient or subrecipient to take disposition actions.
- When included in the terms and conditions of the Federal award, the Federal agency may permit the recipient to retain equipment, or authorize a pass-through entity to permit the subrecipient to retain equipment, with no further obligation to the Federal Government unless prohibited by Federal statute or regulation.

Equipment is defined as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$10,000.

Supplies are defined as tangible personal property other than "equipment" for use in this guidance have a disposition requirement when the residual value of the combined unused inventory exceeds \$5,000. In cases where this may occur, the awarding agency is entitled to its share of the value of the remaining inventory.

Sub-Granting

No subrecipient receiving FY2025 HSGP funding may sub-grant funding to another entity without prior coordination and approval from Ohio EMA.

Single Audit Requirements

Subrecipients are responsible for obtaining audits in accordance with the Single Audit Act Amendments of 1996 (31 U.S.C. 7501–7507); 31 U.S.C. 503, 1111; Executive Order 8248; Executive Order 11541; and 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.” The audits shall be made by an independent auditor in accordance with generally accepted government auditing standards covering financial audits. Subrecipients must ensure that funds received and expended under this grant program are coordinated with the county’s fiscal office (treasurer, auditor, etc.).

Audit Findings

As the State Administrative Authority (SAA), Ohio EMA takes seriously the responsibility of administering the grant funds we are entrusted with from DHS/FEMA. This guidance refers to the Super Circular (2 CFR Part 200) and the requirements therein. Subrecipients should refer to the Super Circular and ensure they are meeting all requirements set forth therein. In addition, all requirements set forth in this guidance are passed along to subrecipients. By signing the grant agreement, subrecipients (agree to be bound by all requirements set forth in this guidance, the grant agreement, and the Super Circular. As a result, any audit findings that occur with respect to improper procurement or from not abiding by the requirements set forth in this guidance will be the responsibility of the subrecipient. Ohio EMA will assume no financial responsibility for said audit findings, and if forced to pay on behalf of the subrecipient will take all action necessary to recover those costs.

Reporting Requirements

Upon official award, applicants acknowledge they agree to complete quarterly reports and submit to the Ohio EMA. Further information on quarterly reporting will be provided following issuance of the official grant agreement.

Subrecipients will be monitored for fiscal performance utilizing the quarterly reports. Ohio EMA staff will be contacting subrecipients that do not reflect adequate spending levels on the quarterly reports in an effort to encourage active spending of the grant award and proactively address problems the Subrecipient is experiencing.

Payment

Reimbursement Requests

The reimbursement request process for the FY2025 HSGP programs will be executed solely through the EM Grants system. In order to be processed, Ohio EMA will require that reimbursements include documentation noting that services have been completed (contract, personnel, etc.) and/or that equipment has been received on site and invoiced. To be reimbursed, costs must be eligible and proper back-up documentation must be submitted through the EM Grants.

Subrecipients must submit cash reimbursement requests as expenses are incurred or no less than once a quarter. Failure to do so will result in improper federal reporting and may result in loss of funds.

Upon approval by the Grants Branch, the subrecipients’ funds will be requested for payment from Ohio

EMA's fiscal unit. The payment process entails requesting money from the federal entity, receiving funds at the state level, vouchering the funds and the dispatching of an EFT/warrant to the subrecipient. While this process relies heavily on external stakeholders, Ohio EMA Grants Branch staff will work to ensure the quickest processing of subrecipient payments.

Standards for Review

The reimbursement review process includes an initial review for completeness, determination of eligibility and data entry of the cash request for tracking/monitoring. This review is conducted by the Grants Specialist and focuses on accuracy of requests, prior approval of costs in the budget and ensuring complete documentation accompanies the request. Cash requests that are properly executed by the subrecipient will be processed in 14 business days or less.

If a request is not complete (including but not limited to the following items: lack of proper documentation, costs not included on the approved budget, no prior EHP approval, etc.) the request will be rejected to the subrecipient fiscal agent for revision. Subrecipients are encouraged to utilize their Grants Specialist for technical assistance in filling out the cash request and compiling documentation to support the cash request prior to submission in an attempt to expedite the approval process.

Enforcement, Termination, and After the Grant Requirements

Ohio EMA is required to monitor the subrecipient's compliance with the Federal statutes, regulations, State law and terms and conditions of the sub award as codified in 2 CFR 200.331. If Ohio EMA becomes aware of an area of non-compliance it will inform the subrecipient through a Notice-of-Non-Compliance. The subrecipient may be given steps to remedy the area(s) of non-compliance, or if the non-compliance cannot be remedied then Ohio EMA will take action against the subrecipient congruent to 2 CFR 200.338-339. Ohio EMA can impose any of the following actions for non-compliance: temporary withholding of funding, disallowing costs and/or reimbursements, wholly or partially suspend an award of funds, initiate suspension or other departmental proceedings, withhold further funding or participation in the program, and any other remedy that is legally available. Below is an outline of the monitoring process the subrecipient is agreeing to follow:

- **Notice of Non-Compliance:** The Ohio EMA Grants Branch Chief will send electronic notice of Non-Compliance to the subrecipient. The Notice of Non-Compliance will inform the subrecipient of the following: The area(s) of non-compliance; Either (1) the steps required to of the subrecipient to come into compliance and the date by which the subrecipient must demonstrate compliance and the agency action if compliance is not met; or (2) Ohio EMA's action against the sub- recipient if Ohio EMA determines non-compliance cannot be remedied; The method for requesting review of compliance steps or agency action.
- **Review subrecipient's submission of compliance:** In the event the subrecipient submits compliance documentation, Ohio EMA Grants Administrator, in conjunction with the Grants Branch Chief, will review the subrecipient's written submission and determine if there is full compliance. If the subrecipient has not met full compliance, Ohio EMA will take agency action, through a Notice of Action, the subrecipient received notice of in the previously issued Notice of Non-Compliance.
- **Method for requesting review:** Subrecipient will have thirty (30) days from the date of the Notice of Action to request reconsideration with the Executive Director. The sub- recipient must send the request in writing and should include any additional information or documentation within the

thirty-day period for the Executive Director to consider. The Executive Director will make a decision in writing within sixty (60) days of receipt of the request for reconsideration.

However, if the Executive Director needs additional time, the subrecipient will be given notification of the extended time frame. The decision of the Executive Director is final. The subrecipient is not entitled to any further appeals within Ohio EMA, or pursuant to any federal or state regulation, code, or procedure.

Availability of Public Records

Ohio's Public Records Law generally requires disclosure of information. Ohio Revised Code Section 149.43 sets forth requirements, along with exceptions for disclosure. Specifically, Section 149.433 allows some security information to be exempt from disclosure.

Applicants are encouraged to consult state and local laws and regulations and discuss these requirements with their legal counsel. Subrecipients should be familiar with the regulations governing protected critical infrastructure information (6 C.F.R. Part 29) and sensitive security information (49 C.F.R. Part 1520), as these designations may provide additional protection to certain classes of homeland security information.

Points of Contact

For Grant Fiscal and Administrative needs, contact:

Ohio EMA Grants Branch

Grant Administrators:

Geoffrey Martin, Grants Branch Chief
Margo Schramm, Grants Administrator

(614) 799-3836 gsmartin@dps.ohio.gov
(614) 799-3843 mlschramm@dps.ohio.gov

Grant Management Specialists:

Anne Marie Dennison (OHS Regions 1/3)
Tim Manns (OHS Regions (4/6/7)
Hank Mylander (OHS Regions (2/5/8)

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(614) 799-3654 dhmylnader@dps.ohio.gov

Grant Monitoring Specialist:

Seth McDonald

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For Training and Exercise needs, contact:

Ohio EMA Planning, Training, & Exercise Branch

David Nunley, Training & Exercise Supervisor
Lissa Jones, Training Coordinator

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