

Radiological Emergency Preparedness (REP) Program Grant Manual



Illinois Emergency Management Agency
Bureau of Operations, REP Section
Version 2.0
Effective 07/01/18

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I. Foreword

In an effort to assist local governments in the preparation of paperwork required for the REP Program grant, the Illinois Emergency Management Agency has developed this guidance manual. Guidance is provided to increase transparency and understanding of eligible expenses and purchases under this grant. Also, this guidance will help to ensure funds are being distributed fairly and in accordance with 32 Illinois Administrative Code 501, *Compensation of Local Governments for Emergency Planning and Participation in Nuclear Emergency Response Exercises*.

Use of this manual is recommended during the preparation of documentation for compensation by all levels of local government.

The manual cannot and does not address all questions that might arise nor does it provide the user with a complete set of grant requirements, guidelines, or policies. IEMA staff should be contacted for clarification of requirements and approval of purchases and expenses, unless specifically stated otherwise.

II. Definitions

“Administrative Rule” means 32 Illinois Administrative Code 501 or 32 Ill. Adm. Code 501.

“Grant” means the funding provided under the REP Program pursuant to Section 4 of the Nuclear Safety Preparedness Act and 32 Illinois Administrative Code 501.

“Grantee” means local governmental entities required to prepare for an incident at a nuclear power station and eligible for reimbursement under the REP Program grant.

“IEMA” means the Illinois Emergency Management Agency.

“IPRA” means the Illinois Plan for Radiological Accidents.

“REP Program” means the Radiological Emergency Preparedness Program of the state of Illinois.

III. Purpose

The REP Program provides grants to local governments for expenses relating to implementation of emergency preparedness activities conducted to respond to the possibility of nuclear accidents at nuclear power plants. Due to the amount of funding allowed by statutory authority, the grant is only intended to reduce the costs to grantees for **necessary activities** performed in implementation of the Act.

Necessary activities include:

- 1) Plan development and maintenance
- 2) Preparation for and participation in training
- 3) Preparation for and participation in exercises and drills
- 4) Maintenance of a specific capability to implement nuclear emergency response plans

A. Funding Source

IEMA provides funding for the grant from fees assessed pursuant to the Illinois Nuclear Safety Preparedness Act (Act) [420 ILCS 5/1 *et. seq.*]. Appropriations to IEMA for compensation to all local governments from the Nuclear Safety Emergency Preparedness Fund shall not exceed \$650,000 per state fiscal year per Section 4 of the Act. The state fiscal year runs from July 1 to June 30.

B. Administrative Rule

The REP Program grant is administered in accordance with 32 Illinois Administrative Code 501, *Compensation of Local Governments for Emergency Planning and Participation in Nuclear Emergency Response Exercises*, which is included as *Attachment A* to this manual.

IV. Program Basics

This section provides basic guidance for the REP Program grant including what is expected from the grantees for performance and reporting documentation. Please see the pertinent sections of the administrative rule, as specified, for additional details.

A. Eligibility

Local governments that incur expenses specifically related to the implementation of the REP Program in the state of Illinois are eligible for grant funds. Grant funds shall only be provided for those activities that are required by the REP Program or specifically related to the REP Program, as approved by IEMA. It is the responsibility of the local governments to provide sufficient and accurate documentation to justify funding under the grant.

B. Record Retention and Agency Audit

Grantees must maintain documentation of expenditures under the grant for a minimum of five years.

IEMA has the right to audit and obtain copies of the books, records and any other recorded information of the grantee related to grantee expenses for which the grantee received compensation under the grant.

If, through an audit, IEMA finds that the grantee has misspent or improperly held any grant funds, IEMA shall have the right of recovery of grant funds in accordance with the provisions and procedures of the Illinois Grant Funds Recovery Act [30 ILCS 705].

C. Determination of Grant Awards

For an explanation of how IEMA determines the grant awards, please refer to Section 501.50 of the administrative rule.

D. Application

- i. The Grant Accountability and Transparency Act (GATA) requires all grantees to complete a pre-registration and a financial and administrative risk assessment through the GATA portal. Grant agreements cannot be provided, processed or executed until all steps in the GATA process have been satisfactorily completed.

All procurement rules, as prescribed under GATA, must be followed or claims will be denied.

For additional information on the GATA requirements, please refer to www.grants.illinois.gov or contact IEMA's Chief Accountability Officer (CAO).

- ii. **SUBMISSION.** The deadline for submitting an application for a REP Program grant is March 15th of each year. Applications are provided to eligible local governments in January, or as soon as practicable, each year. Applications will be available through the IEMA grants portal <http://grants.iema.state.il.us>. The grantee must submit all the information required by the application and Section 501.60 of the administrative rule by the due date in order for the application to be considered a timely submission. Failure to file an application in a timely manner may result in denial or reduction in funding.

- iii. **SPECIAL REQUESTS AND REQUIREMENTS.** If local governments identify a need for additional funding for special requests and requirements, applications may be submitted at any time throughout the fiscal year covered by the grant, but no later than May 1, to allow for approval and processing. Additional funding requests after May 1 will be subject to IEMA's ability to process before the end of the fiscal year. Special requests and special requirements are defined in subsections 501.50 (b) and (c) of the administrative rule and are subject to availability of funding.

E. Intergovernmental Grant Agreement

IEMA shall execute an intergovernmental grant agreement with each grantee to whom a grant is awarded. No funding will be disbursed without a signed, fully executed grant agreement. A grant agreement is considered fully executed after being signed by the director of IEMA, or delegate, and the principal executive officer, or the highest elected official, for the local government.

Further information regarding the grant agreement can be found in Section 501.70 of the administrative rule.

F. Annual Spend Plan

When completing the proposed annual spend plan, the grantee should consult the section of this manual entitled “Permissible Uses of Grant Funds”.

IEMA will provide an approved annual spend plan to each grantee based on the grantee’s expected expenditures for necessary activities provided during the application process. The spend plan, provided with the fully executed grant agreement, documents the approved expenditures for the grantee. Any changes to the spend plan must have prior approval in writing from IEMA.

An example of an annual spend plan is provided as *Attachment B* to this manual.

G. Disbursement of Grant Funds

On July 1 of each year, or as soon thereafter as is practicable, IEMA will disburse to the grantee the amount specified in the grant agreement. Payment of funds is in advance of anticipated expenditures.

It is IEMA’s intent that grant funds will be disbursed on July 1 of each year or as soon as practicable thereafter. However, such disbursement might be delayed for reasons beyond IEMA’s control (e.g., failure of the General Assembly to make appropriations before July 1).

H. Claims Submissions

All entities who have received a grant are required to submit a performance report pursuant to GATA, and financial claims, which detail expenditures, pursuant to Section 501.80 of the administrative rule. The Performance Report must provide a detailed narrative of work completed toward each of the following tasks:

- Annual review and update of the Illinois Plan for Radiological Accidents (IPRA)
- Exercise participation and successful demonstration of required exercise criteria
- Successful corrective actions for issues identified during an exercise or a federal or state plan review

- At a minimum, biennial participation in REP specific training provided or approved by grantor

An example of a Performance Report and Financial Claim Form is provided as *Attachment C* to this manual.

Grantees shall submit a Performance Report and Financial Claim Form to the Grantor according to the schedule set out below.

Counties must submit a Performance Report and Financial Claim Form on a quarterly basis. Due dates for county claims are as follows:

1 st Quarter (July-September)	October 31
2 nd Quarter (October-December)	January 31
3 rd Quarter (January-March)	April 30
4 th Quarter (April-June)	July 31

All other entities must submit claims bi-annually. These claims are due January 31 and July 31.

Failure to submit claims by the required deadlines may result in denial of the claims.

All claims must be for the quarter in which they occurred and provide specific and adequate details of the activities so IEMA can determine whether the funding was spent in accordance with the approved spend plan and for activities related to the REP Program. “Occurred” means when the grantee’s cost happened, not when the grantee’s invoice is due or when the vendor was paid. Service dates on the invoice are essential in determining during which quarter the invoice is to be claimed. Receipts must be included for all purchases listed on the quarterly claim. For personnel services, specific detail must be provided for activities the individual actually spent time on that are related to the REP Program (e.g., one hour attending IEMA training on dosimeters). Additional information regarding personnel services is provided under the “Authorized Expenses” section of this manual and in *Attachment D*.

Although IEMA personnel are available to assist, entities are ultimately responsible for completing claim submittals in an accurate and timely manner. It is solely the grantee’s responsibility for obtaining and submitting all required documentation. When completing claim forms, it is imperative that entities follow their approved annual spend plan.

Unclaimed funds are considered by IEMA to be unspent funds. IEMA will account for unspent funds by offsetting the next fiscal year grant by the amount of the unspent funds or recovering the funds under the Illinois Grant Funds Recovery Act.

V. **Permissible Uses of Grant Funds**

This section provides guidance to assist grantees with developing the annual spend plan for necessary activities (as outlined in subsection 501.90(b) of the administrative rule) related to the REP Program. Before completing the proposed annual spend plan, grantees should review the necessary activities and authorized expenses sections below. Grant funds will only be allowed for those necessary activities that are required or are specifically related to the REP Program.

Please be aware that while it is IEMA's goal to provide grantees with all the funding necessary to implement the program, there is no guarantee grantees will receive 100 percent of funding requested due to funding limitations.

Any activity or expense may be denied if it is deemed ineligible, unreasonable, excessive or insufficiently documented.

A. Plan Development and Maintenance

Those tasks associated with the plan development and maintenance pertaining to radiological accidents, including the following:

- Reviewing, updating, and revising IPRA site-specific plans, IPRA standard operating procedures (SOPs) or local implementation procedures; and
- Conducting IPRA planning meetings with state, utility or local government officials or staff. An agenda and sign-in-sheet are required to be eligible under the grant. It is solely the grantee's responsibility for obtaining and submitting all required documentation. The grant will only cover time spent specifically on REP Program subject matter. For example, meetings addressing additional subjects beyond the REP Program will only be able to claim time spent specifically covering the REP Program.

Activities that are NOT allowed include, but not are limited to, the following:

- Tasks required under the GATA
- Preparation of spend plans, grant applications, performance reports or claim documentation
- Obtaining signatures for plan approval or certification
- Customizing materials (plans/maps/reports/guides/etc.) as provided by IEMA

B. Preparation for and participation in training

Those tasks associated with the preparation for and participation in training pertaining to radiological accidents, including the following:

- Coordinating events in preparation for participating in training
- Attending courses provided by IEMA on the following subjects:
 - County / Municipal Emergency Operations Center (EOC)
 - Emergency Worker
 - Traffic and Access Control
 - Contamination Control
 - Decontamination
 - Dosimetry Control Officer
 - Medical Services
 - Public Officials REP Program Overview
 - Other courses may be eligible but will require IEMA's pre-approval.
- Attending courses provided by Federal Emergency Management Agency (FEMA) on the following subjects:

- REP Core Concepts Course
- REP Planning Core Concepts Course
- REP Plume Planning Course
- REP Exercise Evaluator Course
- REP Exercise Controller Course
- REP Post-Plume Plan Review Course
- REP Disaster Initiated Review Course
- Other courses may be eligible but will require IEMA's pre-approval.

Activities that are NOT allowed, but are not limited to, the following activities:

- Attending offsite agency dinners
- Providing trainings not pre-approved by IEMA
- Providing trainings, in whole or in part, not directly related to the REP Program
- Attending trainings not specifically required or directly related to the REP Program (e.g., NIMS, ICS, *IEMA Training Summit, etc.)

*Funding will be provided **only** for time attending REP Program specific sessions or pre-approved REP Program meetings at the IEMA Training Summit.

IEMA must pre-approve any training provided by the grantee that is in addition to IEMA training and being submitted for funding. Prior to conducting the training, the grantee must provide a copy of the agenda that is specific to all areas of information that will be delivered during the training, the dates and times of the

training, and who will be attending. Verification of attendees (sign-in-sheet) will also be required when submitting a claim. Approval for funding will only apply to the dates and times of training and agenda specific to the REP Program and pre-approved by IEMA.

Grantees must provide verification of attendance when claiming expenses for attending REP Program related training. Certificates of completion and/or a sign-in-sheet are acceptable documents for verifying attendance. It is solely the grantee's responsibility for obtaining and submitting all required documentation.

C. Preparation for and participation in exercises and drills

Those tasks associated with the preparation for and participation in exercises and drills pertaining to radiological accidents, including the following:

- Preparatory events for participating in exercises and drills as listed below:
 - Extent of Play meetings
 - Updating REP exercise documents
 - Conducting REP specific exercise meetings
- Performance of duties during the course of REP exercises, drills, or tests, as listed below:
 - EOC Activation
 - NARS Communication Drill
 - School Evacuation Demonstration
 - Medical Drill
 - Traffic and Access Control Demonstration
 - Federally required REP demos
 - Reception and Congregate Care Demonstration

Please contact IEMA regarding questions about additional eligible tasks/demonstrations not listed above.

Activities that are NOT allowed include, but are not limited to, the following:

- Physically cleaning an EOC, related office space or equipment
- Physically cleaning vehicles
- General administrative functions of maintaining an EOC not specifically required by the REP Program
- Providing food

D. Maintenance of a specific capability to implement nuclear emergency response plans

Those tasks associated with the maintenance of a specific capability to implement nuclear emergency response plans pertaining to radiological accidents, including, but not limited to, the following:

- Radios
- Computers
- Phones
- Fax machines

Please contact IEMA regarding questions about additional eligible expenses not listed above.

Activities that are NOT allowed include, but are not limited to, the following:

- WEBEOC maintenance (unless the entity can justify and document specific detail and time directly related to the REP Program);
- Testing systems that are required, by statute, rule, regulation, requirement or policy, to be tested outside or not related to the REP Program.

VI. Authorized Expenses

For those local governments that participate in the necessary activities provided under subsection 501.90(b) of the administrative rule, authorized expenses are divided into five categories in subsection 501.90(c) of the administrative rule: personnel services, travel, equipment use, telecommunications and miscellaneous expenses.

Grantees cannot receive funding under this grant for costs not actually paid by the local government. If the local government receives funding from another grant or other source for the same activity, it cannot receive funding under this grant for that same activity.

A. Personnel Services

This category includes the local government cost of providing wages, plus fringe benefits, actually paid to employees of the grantee for participation in necessary activities. Compensation shall be based on hourly rates for the number of hours of actual participation in necessary activities.

Local governments will be required to provide documentation of the actual wages, etc. that are paid to the employee and the actual time spent in that activity.

An example of personnel services documentation is provided as *Attachment D* to this manual.

Annually, or upon change in status, a copy of the most recent union contract that specifies employees will be compensated at a multiplied hourly rate for overtime

(i.e. must be paid a minimum of two hours for one hour of overtime worked) must be provided to IEMA for such claims to be considered.

Personnel services used for administrative purposes, such as preparation of grant documentation, reading, writing or forwarding emails, reading, writing or forwarding calendar invitations or physically cleaning an EOC, are not allowed under the grant.

Personnel expenses related to delays in travel (e.g., rental car issues, delay in plane departures/arrivals, etc.) will not be funded by the grant. Traveling on weekends or outside normal work hours, unless required by REP Program scheduled events, is not eligible under the grant. IEMA will not approve claims for time over eight hours for any day unless the grantee specifically documents that the entire time was spent doing necessary activities related to the REP Program.

Claims for personnel time for volunteers are not eligible under the grant unless a local government resolution specifically sets an hourly rate. The hourly rate cannot exceed the usual and customary amount paid to volunteers for assisting the grantee in emergency preparedness functions. Annually, or after a change in status, a copy of the most recent resolution must be provided to IEMA for such claims to be considered.

B. Travel

This category includes travel allowances actually paid to grantee employees or volunteers for transportation, lodging and per diem or meal expenses provided in connection with their participation in necessary activities.

Documentation of actual expenses paid will be required (i.e., receipts). Compensation shall not exceed the rate in the state of Illinois Travel Regulations [80 Ill. Adm. Code 3000]. If a grantee ordinance or rule applicable to all employees specifies a higher rate, documentation must to be provided to IEMA to justify the rate.

C. Equipment Use

This category includes costs actually paid for grantee owned or leased equipment used during or in connection with necessary activities.

Pursuant to subsection 501.90(c)(3)(B) of the administrative rule, compensation shall not exceed the state of Illinois rate. Current rates can be found in the FEMA Schedule of Equipment Rates.

Documentation of equipment use shall include:

- purpose of use (required detailed narrative must show a direct relation to one of the four necessary activities, as defined in the administrative rule)
- date of use
- type of equipment
- entity that used the equipment

- miles or hours that the equipment was in use (specific to the REP Program only); and
- cost per mile for equipment use

An example of vehicle documentation is provided in *Attachment E* of this manual.

D. Telecommunications

Telecommunication agreements pre-approved by IEMA are used in determining eligible grant costs. Expenses submitted outside of the IEMA pre-approved telecommunication agreement will not be considered eligible claims.

Telecommunication expenses may include Emergency Operation Center (EOC) land, cellular, fax lines, pagers and internet service specifically used to maintain capability to implement nuclear emergency response plans. These expenses may include the installation, service, maintenance charges and monthly usage charges. Although EOC phone line expenses are eligible under the grant, the grant will not cover increases, including, but not limited to, the number of EOC phone lines, costs, fees or related expenses without pre-approval by IEMA.

Required documentation for these expenses include the billing from the company and a specific explanation of how these services allow the local government to maintain capability for nuclear emergency response.

IEMA will determine approval/denial based on justification and availability of funds.

E. Miscellaneous Expenses

This category is for those expenses specifically related to the REP Program not covered under the previous four categories.

These expenses include, but are not limited to, office supplies and postage. Maintenance agreements are also part of this category; however, such agreements must have prior approval from IEMA. A list of specific requested miscellaneous items and a justification must be submitted with the application.

Grantees should be aware that with limited funding, miscellaneous expenses will be the first category to be denied in favor of more essential expenses.

IEMA will determine approval/denial of miscellaneous expenses based on justification and availability of funds.

Activities that are NOT allowed include, but are not limited to, the following:

- Claims for appreciation/holiday letters, cards or gifts
- Construction expenses
- Providing food for any event