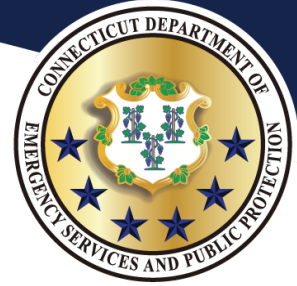




# CONNECTICUT DIVISION OF EMERGENCY MANAGEMENT & HOMELAND SECURITY



## DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION

### HSGP Policy No.3

**TO:** Homeland Security Grant Program Sub-Recipients

**THROUGH:** Brenda Bergeron, Deputy Commissioner DESPP/DEMHS  
William Turner, State Emergency Management Director

**FROM:** DEMHS Planning and Preparedness Grants

**DATE:** December 5, 2025

**SUBJECT:** Payment to Contractors and Volunteer Members from Homeland Security Funds

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The purpose of this Grant Policy is to provide Connecticut Homeland Security Grant Program (HSGP) sub-recipients with a grant policy and guidance around the utilization of contractors for HSGP-eligible activities.

#### **Background**

DHS/FEMA's State Homeland Security Grant Program assists state, local, tribal, and territorial (SLTT) efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare for, protect against, and respond to acts of terrorism. The hiring of contractors to complete eligible HSGP activities is allowed under the program. In order for sub-recipients to hire and utilize the services provided by a contractor, sub-recipients of HSGP funds must comply with the following federal and state standards and provide adequate documentation and reporting to DEMHS when required.

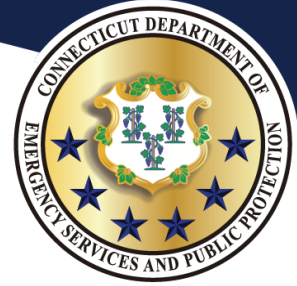
Due to increased review by federal partners on all HSGP reimbursements, DESPP/DEMHS is instituting a contractor policy on what contractor activities can be eligible for reimbursement and the required documentation that must be submitted for reimbursement and/or cash advance.

#### **Procurement**

Recipients and Sub-Recipients of HSGP funds must comply with the federal procurement standards in 2 C.F.R. Part 200, subparts D and E (Uniform Administrative Requirements, Cost Principles, Audit Requirements) when purchasing goods or services under the award. The sub-recipient must have a procurement policy that addresses competition, conflict of interest, cost reasonableness, documentation, contractor selection, and contract administration.



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Additionally, Contractors must not be debarred or suspended from federal awards; screening via the System for Award Management (SAM) or similar is required.

Contracts shall not have a term longer than one year and shall not start or go past the period of performance of the intended HSGP funding year. If extension to the contract is required, written notice shall be provided to DEMHS and must be approved before costs are incurred that would fall into another performance period. The Recipient or Subrecipient is required to provide the contract to DEMHS annually, along with any contract extensions.

### **Scope of Work**

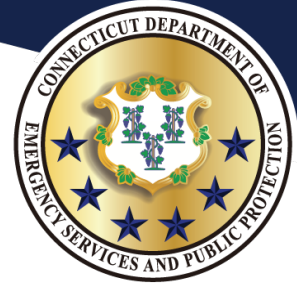
The contract scope must reflect only allowable costs under HSGP, and costs must be reasonable, allowable, and necessary. The sub-recipient must provide DEMHS with a detailed scope of work to be reviewed and approved prior to the hiring of the contractor. The sub-recipient must monitor contractor performance and cost eligibility prior to the payment to a contractor. As outlined in the scope of work, the contractor must provide the scope of the services to the sub-recipient, including deliverables and costs associated with the services provided. The specific list of deliverables for the Contractor to complete must be pre-approved by DESPP/DEMHS and monitored by the sub-recipient. If the Contractor fails to complete a specific task or adhere to the approved scope of work for the sub-recipient, the sub-recipient must notify DESPP/DEMHS and seek guidance.

### **Reimbursement/Cash Advance Documentation**

The payment process for contracted work for recipients and sub-recipients will follow the established procedures outlined by DEMHS in coordination with the DEMHS Grant Program Manager responsible for the particular grant. In order to receive payment for work completed by a contractor hired by a sub-recipient with HSGP funds, DEMHS will require a detailed summary of the activity, time spent, and price matching either the confirmed hourly amount or total cost listed in the approved Scope of Work (SOW); this can be provided in the format of an invoice from the contractor to the sub-recipient. Additional backup documentation will also be required for payment, such as meeting minutes/agendas, plans and/or reports, or confirmation from the subrecipient that the contractor has completed the deliverables set forth within the approved SOW. If exercising the cash advance option, sub-recipients must provide detailed information regarding the services to be provided by the contractor in accordance with the approved SOW, and once the payment is made to the contractor for the services rendered, the sub-recipient must provide the invoice and proof of payment to reconcile the advance.



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### **Volunteer Civil Preparedness Forces Applicability**

In Connecticut, it is common for members of the emergency management and homeland security community to serve on volunteer emergency management and homeland security teams and committees for their communities and the state. However, a contractor cannot be reimbursed for any activity completed as a member of a volunteer civil preparedness team. This includes and is not limited to involvement in any Incident Management Team (IMT), local Community Emergency Response Team (CERT), Regional Emergency Planning Team (REPT), Search and Rescue (SAR), or Medical Reserve Corps (MRC). A contractor also cannot be reimbursed for any activity or task that he/she is receiving compensation for with funds other than HSGP funding.

If a Subrecipient fails to follow the guidelines, policies, and procedures outlined in this document and other HSGP guidance, they may be responsible for any costs incurred and paid to a contractor that are deemed ineligible. DEMHS reserves the right to void any payment request if there is clear evidence that Federal and State policies and/or laws have been broken.

### **Hiring Contractors for Training or Exercise**

This policy does not directly change the process for subgrantees hiring contractors for training or exercise purposes. The current process of seeking DEMHS approval from the HSGP Program Manager and DEMHS Training Supervisor before procuring a training or exercise event is still in effect.

Questions regarding this Policy may be directed to DEMHS Homeland Security Grant Program staff at [demhs.hsgp@ct.gov](mailto:demhs.hsgp@ct.gov)