



**Homeland  
Security**

**ODP Information Bulletin  
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**TO:** All State Administrative Agency Heads  
All State Administrative Agency Points of Contact  
All State Homeland Security Directors

**FROM:** C. Suzanne Mencer  
Director

**SUBJECT:** Clarifying Overtime and Backfill Policies for Part-time Employees and  
Volunteers

ODP has received the following policy clarifications from the Department of Homeland Security Office of General Counsel on using ODP grant funds to cover overtime and backfill expenses for part-time and volunteer emergency response personnel participating in ODP training and exercises. This guidance applies to current and previous fiscal year funding for ODP grant programs.

**A. Part-Time Personnel**

If an agency has budgeted employees to work less than a full-time schedule, the time that these employees spend traveling to and attending ODP training and exercises above and beyond their regularly scheduled hours can be considered overtime and therefore covered along with backfill costs using ODP grant funds. For example, if an agency budgets an individual for 20 hours per week but ODP training and/or exercise activities require that person to work 25 hours in a week, the 5 extra hours spent in training and/or exercises could be covered by ODP grants.

**B. Paid-For-Call, Paid-On-Call, and Paid-Per-Call Volunteer Personnel**

If an agency relies upon paid-for-call, paid-on-call, and/or paid-per-call volunteer personnel and opts to include them in ODP training and exercises, grantees can use ODP grant funds to pay volunteers for their attendance at these activities in accordance with established processes, to include both hourly and flat-rate payment.

**C. Stipends for Volunteer Firefighter Personnel**

Stipends for purely volunteer firefighters to attend ODP training and exercises are allowable when volunteers are completely unpaid and no legal agreement exists to support pay for training and exercise activities, provided that ODP receives written justification establishing: 1) the difficulty states/locals are facing getting responders to participate as unpaid volunteers, and 2) why volunteers who are already willing to provide time without pay are unwilling to give extra time for training and exercises. The justification must be based on a finding that paying volunteers is a primary factor in enticing them to participate in training and exercise activities.

The justification must explain how participation in ODP-approved training and exercises makes participants better at the work they perform during their regular volunteer duties. Finally, the state should develop a policy stating the standardized stipend amount to be provided for participation in training and exercises.

This justification and policy should be provided in writing to ODP through your Preparedness Officer.

#### **D. Reimbursing Wages for Volunteer Responder Personnel**

If volunteer responders are required to take off time from work in order to participate in ODP training and exercises, grant funds can be used to reimburse lost wages provided that certain requirements are met. First, ODP must receive written justification establishing the amount of wages lost by each volunteer responder participating in the training or exercises, including time and rate of pay. Second, the written justification for such costs must outline how paying volunteers is a primary factor in enticing them to participate in training and exercise activities. Third, reimbursement funds must be provided directly to the employer for pass-through to the volunteer. Finally, the state should develop a policy stating the reasonable maximum reimbursement amount (on either an hourly or annual basis) and submit to ODP.

This justification and reimbursement policy should be provided in writing to ODP through your Preparedness Officer.

For further information on these policies, please contact your Preparedness Officer or the ODP Helpline at 1-800-368-6498.