



***Cal* OES**

**GOVERNOR'S OFFICE
OF EMERGENCY SERVICES**

**Fiscal Year 2019
Emergency Management
Performance Grant**

***California Supplement to the
Federal Notice of Funding Opportunity***

September 2019

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Federal Program Announcement	<p>In April 2019, the U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA) issued the Fiscal Year (FY) 2019 Emergency Management Performance Grant (EMPG) Program, Notice of Funding Opportunity (NOFO) and FEMA Preparedness Grants Manual. Subrecipients must follow the programmatic requirements set forth in the NOFO, FEMA Preparedness Grants Manual, and the applicable provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards located in Title 2, Code of Federal Regulations (C.F.R.), Part 200.</p>
Information Bulletins	<p>DHS issues Information Bulletins (IBs) to provide updates, clarification, and new requirements throughout the life of the grant.</p>
Purpose of the California Supplement	<p>The FY 2019 EMPG California Supplement to the NOFO (State Supplement) is intended to complement, rather than replace, the NOFO and the Preparedness Grants Manual published by DHS/FEMA. It is recommended that Applicants thoroughly read the NOFO and the Preparedness Grants Manual before referring to the State Supplement. The State Supplement will emphasize differences between the FY 2018 and FY 2019 EMPG, and highlight additional California policies and requirements applicable to the FY 2019 EMPG.</p>
Key Changes to the FY 2019 EMPG	<ul style="list-style-type: none">• The FY 2019 EMPG subaward period of performance will be 24 months. In FY 2018, the period of performance was 12 months.• The FY 2019 EMPG Financial Management Forms Workbook (FMFW) has been updated.• Starting in FY 2019, all EMPG Subrecipient projects must align to the California Homeland Security Strategy Goals.• Subrecipients will be required to complete and include the Certification Regarding Lobbying form as part of the application package.• Subrecipients should be reporting expenditures and requesting funds at least semi-annually throughout the period of performance.
Grant Management Memoranda	<p>Cal OES issues Grant Management Memoranda (GMMs) which provide additional information and requirements regarding EMPG funds.</p>

Eligible Subrecipients	Eligible Applicants, referred to as Subrecipients, include Counties/Operational Areas (OAs) and federally-recognized tribes located in California.
Tribal Allocations	<p>The NOFO strongly encourages Cal OES to provide access to EMPG funds directly to tribes in California. To implement this requirement, a special Request for Proposal will be issued to California's federally-recognized tribes and Indian organizations, as described in the Cal OES Tribal Consultation Policy.</p> <p>All Subrecipients are encouraged to coordinate with tribal governments to ensure that tribal needs are considered in their grant applications.</p>
Subrecipient Allocations	FY 2019 EMPG Subrecipient allocations are included in Attachment A.
NIMS Implementation	Prior to allocation of any federal preparedness awards in FY 2019, Subrecipients must ensure and maintain adoption and implementation of the National Incident Management System (NIMS).
Supplanting	Grant funds must be used to supplement existing funds, not replace (supplant) funds that have been appropriated for the same purpose. Subrecipients may be required to provide supporting documentation that certifies a reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds. Supplanting will result in the disallowance of the activity(s) associated with this improper use of the federal grant funds.
Public/Private Organizations	Subrecipients may contract with any other public or private organizations to perform eligible activities on approved EMPG projects.
Debarred/Suspended Parties	<p>Subrecipients must not make or permit any award (subaward or contract) at any tier, to any party, that is debarred, suspended, or otherwise excluded from, or ineligible for, participation in federal assistance programs.</p> <p>Subrecipients must obtain documentation of eligibility prior to making any subaward or contract funded by EMPG funds, and must be prepared to present supporting documentation</p>

**Debarred/
Suspended
Parties Cont.**

to monitors/auditors.

Before entering into a Grant Subaward, the Subrecipient must notify Cal OES if it knows if any of the principals under the subaward fall under one or more of the four criteria listed at 2 C.F.R. § 180.335. The rule also applies to Subrecipients who pass-through funding to other local entities.

If at any time after accepting a subaward, Subrecipients learn that any of its principals fall under one or more of the criteria listed at 2 C.F.R. § 180.335, immediate written notice must be provided to Cal OES and all grant activities halted until further instructions are received from Cal OES. The rule also applies to subawards passed through by Subrecipients to local entities.

FY 2019 Program Priorities

DHS/FEMA annually publishes the National Preparedness Report (NPR) to report national progress in building, sustaining, and delivering the core capabilities outlined in the goal of a secure and resilient nation. This analysis provides a national perspective on critical preparedness trends for whole community partners to use to inform program priorities, allocate resources, and communicate with stakeholders about issues of concern.

EMPG Subrecipients are required to prioritize grant funding to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the Threat and Hazard Identification and Risk Assessment (THIRA)/State Preparedness Review (SPR) process.

In developing applications for the FY 2019 EMPG Program, Subrecipients should consider funding projects that address areas for improvement as they relate to emergency management capabilities, including:

- Logistics - Distribution Management Planning;
- Evacuation Plan/Annex;
- Disaster Financial Management;
- Catastrophic Disaster Housing; and
- Resilient Communications

In addition, EMPG Subrecipients should consider funding projects that fall into the national priority areas:

- Emerging Threats, including Cybersecurity
- Lifelines (more information in this [fact sheet](#) and [tool kit](#))
 - Safety and Security
 - Food, Water, Sheltering
- Health and Medical
- Energy
- Communications
- Transportation
- Hazardous Material

DHS/FEMA does not prescribe a minimum funding amount for these priorities. However, Subrecipients are required to support local, regional, state, and national efforts in achieving the desired outcomes of these priorities.

National Campaigns and Programs

Active Shooter Preparedness – DHS has developed a comprehensive [Active Shooter Preparedness website](#), which strives to enhance national preparedness through a whole-community approach by providing the necessary products, tools, and resources to help all stakeholders prepare for and respond to an active shooter incident. Subrecipients are encouraged to review the referenced active shooter resources and evaluate their preparedness needs.

Soft Targets and Crowded Places – States, territories, Urban Areas, and public and private sector partners are encouraged to identify security gaps and build capabilities that address security needs of soft targets and crowded places, understanding the unique challenges related to protecting locations which are open to the public.

Community Lifelines – FEMA has introduced a new lifeline construct to enable the operational continuity of government and critical business essential to human health, safety, or economic security during and after a disaster. These lifelines enable a true unity of effort between government, non-governmental organizations, and the private sector, including infrastructure owners and operators. Additional information may be found at the [Community Lifelines Implementation Toolkit website](#).

Match Requirement

The FY 2019 EMPG requires a dollar-for-dollar match. This can be cash or third party in-kind contributions. Refer to 2 C.F.R. § 200.29 and § 200.306 for specific details. Utilizing the FMFW Match ledger, Subrecipients will indicate the appropriate Solution Area and Solution Area Subcategory that accurately represents the specific activity(s) and cost(s) used to meet the match requirement under the FY 2019 EMPG subaward. Contributions from the Surecipient should be specifically identified in the match description located on the FMFW Match ledger. The non-federal match contributions have the same eligibility requirements as the federal share.

Management and Administration

The Management and Administration (M&A) allowance for Subrecipients is set at a maximum of 5% for the FY 2019 EMPG.

Indirect Costs

Indirect costs are allowable under the FY 2019 EMPG Grant Award. Subrecipients who claim indirect costs may do so provided they use one of the following two methods:

1. Subrecipients with an indirect cost rate approved by their cognizant federal agency may claim indirect costs based on the established rate. Indirect costs claimed must be calculated using the base approved in the indirect cost Negotiation Agreement. A copy of the approved Negotiation Agreement is required at the time of application.
2. Subrecipients who have never received a negotiated indirect cost rate and receive *less than* \$35 million in *direct* federal funding per year may claim the 10% de minimis indirect cost rate based on Modified Total Direct Costs as described in 2 C.F.R. Part 200, § 200.68, and Subpart E.

Indirect costs are *in addition to* the M&A allowance, and must be included in the Grant Award application as a “Project” and reflected in the FMFW on the Indirect cost category ledger if being claimed under the award.

Indirect costs must be based on the claimed direct project costs, excluding equipment expenditures and other distorting items. Up to \$25,000 of each subaward may be included as a direct project cost when calculating indirect costs based on Modified Total Direct Costs.

Indirect costs must be claimed no more than once annually, and only at the end of the Subrecipient’s fiscal year. An exception to this rule applies if there is a mid-year change to the approved indirect cost rate; in this case, costs incurred to date must be claimed. At that time, a Grant Subaward Modification reflecting the rate change must also be submitted to Cal OES, along with a copy of the new Indirect Cost Rate Agreement.

Equipment Typing/ Identification and Use

Allowable EMPG equipment is listed on the [FEMA Authorized Equipment List](#) (AEL) website.

Subrecipients that allocate FY 2019 EMPG funds for equipment are required to type and identify the capability associated with that equipment. Also, per FEMA policy, the purchase of weapons and weapon accessories are not allowed with EMPG funds. Special rules apply to critical emergency supplies; refer to Appendix H of the FEMA Preparedness Grants Manual for additional information.

Expenditures for general purpose equipment are allowable if they align to and support one or more core capabilities identified in the National Preparedness Goal (NPG), and in addition, are deployable/sharable through the Emergency Management Assistance Compact and allowable under 6 U.S.C. § 609. Refer to the NOFO for examples of allowable general purpose equipment.

Equipment Maintenance/ Sustainment

Use of EMPG funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable as described in FEMA IBs 336 and 379, as well as Grant Programs Directorate Policy FP 205-402-125-1.

Small Unmanned Aircraft Systems

All requests to purchase Small Unmanned Aircraft Systems (SUAS) with FEMA grant funding must comply with IB 426 and include copies of the policies and procedures in place to safeguard individuals' privacy, civil rights, and civil liberties of the jurisdiction that will purchase, take title to, or otherwise use the SUAS equipment. Please reference [Presidential Memorandum: Promoting Economic Competitiveness While Safeguarding Privacy, Civil Rights, and Civil Liberties in Domestic Use of Unmanned Aircraft Systems](#) for additional information.

Emergency Operations Plans

Subrecipients must update their Emergency Operations Plan (EOP) at least once every two years to remain compliant with the [Comprehensive Preparedness Guide 101 version 2.0](#). Subrecipients are highly encouraged to include an evacuation plan or annex as part of their EOP as well as plans to exercise and validate the evacuation plan and capabilities.

Whole Community Preparedness

Subrecipients should engage with the whole community to advance individual and community preparedness. In doing so, Subrecipients are encouraged to consider individuals with disabilities or access and functional needs, including the needs of children into their planning and exercises.

Conflict of Interest

To eliminate and reduce the impact of conflicts of interest in the subaward process, Subrecipients and pass-through entities must follow their own policies and procedures regarding the elimination or reduction of conflicts of interest when making subawards. Subrecipients and pass-through entities are also required to follow any applicable federal, state, local, and tribal statutes or regulations governing conflicts of interest in the making of subawards.

Subrecipients must disclose to their Program Representative, in writing, any real or potential conflict of interest as defined by the federal, state, local, or tribal statutes or regulations, which may arise during the administration of the EMPG subaward within five days of learning of the conflict of interest.

**California
Homeland
Security
Strategy
Goals**

The State has prioritized the following California Homeland Security Strategy Goals for the FY 2019 subawards:

1. Enhance Information Collection, Analysis, and Sharing, in Support of Public Safety Operations Across California;
2. Protect Critical Infrastructure and Key Resources From All Threats and Hazards;
3. Strengthen Security and Preparedness Across Cyberspace;
4. Strengthen Communications Capabilities Through Planning, Governance, Technology, and Equipment;
5. Enhance Community Preparedness;
6. Enhance Multi-Jurisdictional/Inter-Jurisdictional All-Hazards Incident Catastrophic Planning, Response, and Recovery Capabilities;
7. Improve Medical and Health Capabilities;
8. Enhance Incident Recovery Capabilities;
9. Strengthen Food and Agriculture Preparedness;
10. Prevent Violent Extremism Through Multi-Jurisdictional/Inter-Jurisdictional Collaboration and Coordination;
11. Enhance Homeland Security Exercise, Evaluation, and Training Programs; and
12. Protect Against Effects of Climate Change

**“On Behalf
Of”**

Cal OES may, in conjunction with local approval authorities, designate funds “on behalf of” local entities who choose to decline or fail to utilize their subaward in a timely manner.

**Regional
Approach**

Subrecipients must take a regional approach and consider the needs of local units of government in the projects and activities included in their FY 2019 EMPG application.

**Public Alert
and Warning**

Cal OES strongly encourages Subrecipients to consider use of this funding to assist their jurisdiction’s alignment with the State of California Alert and Warning Guidelines developed pursuant to Senate Bill 833 of the 2018 Legislative Session.

**Financial
Management
Forms
Workbook**

The FY 2019 Cal OES FMFW includes:

Grant Subaward Face Sheet – Use the Grant Subaward Face Sheet to apply for grant programs. The Grant Subaward Face Sheet must be signed and printed in portrait format.

Authorized Agent Contact Information – Provide the contact information of Authorized Agents (AA), delegated via the Governing Body Resolution or Signature Authorization Form, including staff related to grant activities. More than one person is recommended for designation as the AA; in the absence of an AA, an alternate AA can sign requests.

Project Ledger – The Project Ledger is used in the application process to submit funding information and is used for submitting Cash Requests, Grant Subaward Modifications, and assists with completion of the Biannual Strategy Implementation Report (BSIR).

Planning Ledger – Provides detailed information on grant-funded Planning activities with a final product identified.

Organization Ledger – Provides detailed information on grant-funded Organizational activities.

Equipment Ledger – It is an EMPG requirement that detailed information be provided under the equipment description for all grant-funded equipment. AEL numbers must be included for all items of equipment. Always refer to the AEL for a list of allowable equipment and conditions, if any.

Training Ledger – Provides detailed information on grant-funded Training activities. All training activities must receive Cal OES approval prior to starting the event, including a Training Feedback number. The [Training Request Form](#) may be obtained on the Cal OES website.

Exercise Ledger – Provides detailed information on grant-funded Exercises.

M&A Ledger – Provides information on grant-funded M&A activities.

Financial Management Forms Workbook Cont.

Indirect Costs Ledger – Provides information on Indirect Costs.

Consultant-Contractor Ledger – Provides detailed information on grant-funded Consultants, and documents maintenance and sustainment contracts and activities on grant eligible items/equipment.

Personnel Ledger – Provides detailed information on grant-funded Personnel activities.

Match Ledger – Provides detailed information on Match activities.

Authorized Agent Page – The AA Page must be submitted with the application, all Cash Requests, and Grant Subaward Modifications. The AA must include the appropriate signature and date.

Subrecipient Grants Management Assessment

Per 2 C.F.R. § 200.331, Cal OES is required to evaluate the risk of noncompliance with federal statutes, regulations, and grant terms and conditions posed by each Subrecipient of pass-through funding. The [Subrecipient Grants Management Assessment](#) contains questions related to your organization's experience in the management of federal grant awards. It is used to determine and provide an appropriate level of technical assistance, training, and grant oversight to Subrecipients during the subaward. The questionnaire must be completed and returned with your grant application.

Application Attachments

Indirect Cost Rate Agreement – If claiming indirect costs at a federally-approved rate, please provide a copy of your approved Indirect Cost Rate Agreement.

FFATA Financial Disclosure – Use the [FFATA Financial Disclosure](#) to provide information required by the Federal Funding Accountability and Transparency Act of 2006.

Certification Regarding Lobbying – Use the [Certification Regarding Lobbying form](#) to certify lobbying activities, as stipulated by the Byrd Anti-Lobbying Amendment, 31 U.S.C. § 1352.

Standard Assurances

The Standard Assurances list the requirements to which the Subrecipients will be held accountable. All Applicants will be required to submit a signed, **original** of [the FY 2019 Standard Assurances](#) as part of their FY 2019 EMPG application. The required Standard Assurances can be found only in PDF format on the Cal OES website.

NOTE: Self-created Standard Assurances will not be accepted.

Governing Body Resolution

The Governing Body Resolution (GBR) appoints AAs (identified by the individual's name or by a position title) to act on behalf of the governing body and the Applicant by executing any actions necessary for each application and subaward. All Applicants are required to submit a copy of their FY 2019 GBR with their application.

Authorized Agent Information

For each person or position appointed by the governing body, identify the individual in the AA and Contact Information page of the FMFW.

All changes in AA and contact information must be provided to Cal OES in writing. If the GBR identifies the AA by name, a new Resolution is needed when changes are made. If the GBR identifies the AA by position and/or title, changes may be made by submitting a request on the entity's letterhead, signed by an existing AA. Cal OES will not accept signatures of an AA's designee.

Application Submission

Subrecipients must submit an electronic copy of their completed FMFW to their Program Representative for review prior to submitting a signed hardcopy. The electronic copy of the FMFW should be submitted for Cal OES review by no later than fourteen (14) calendar days before the final Application due date. Submission of the hard copy originals is only to occur after the Cal OES EMPG Program Representative's review has concluded and the Subrecipient is directed by their Program Representative to submit the signed hard copy.

After the application is approved, a completed hard copy of the FMFW, along with all other application components must be received by Cal OES by no later than December 6, 2019. During the application process, if it is determined all allocated funds cannot be expended by the end of the period of performance, inform your Program Representative as soon as possible. The FY 2019 EMPG Timeline is referenced as Attachment A.

Late or Incomplete Application

Late or incomplete applications may be denied. If an application is incomplete, the Program Representative may request additional information. Requests for late submission of applications must be made in writing to the Program Representative prior to the application due date. Cal OES has sole discretion to accept or reject a late or incomplete grant application.

EMPG Contact Information

All Subrecipient application materials, questions, comments, and correspondence should be directed to:

California Governor's Office of Emergency Services
ATTN: Grants Management (Building E)
Emergency Management Performance Grants Unit
3650 Schriever Avenue
Mather, CA 95655

Ronak Patel	(916) 845-8124
Bryan Reich	(916) 845-8794
Yer Yang	(916) 845-8468

The [Program Representative Regional Assignments Map](#) is available under "Regional Assignments"

**Subaward
Approval**

Subrecipients will receive a formal notification of award. Subrecipient Award letters must be signed and the original be returned to Cal OES within 20 calendar days. Once the completed application along with the signed award letter is received and approved, reimbursement of eligible subaward expenditures may be requested using the Cal OES FMFW.

Payment Request Process

EMPG is a reimbursement grant. To request a cash reimbursement of FY 2019 EMPG funds, Subrecipients must first complete a payment request using the Cal OES FMFW, returning it to the appropriate Program Representative. Subrecipients who fail to follow the workbook instructions may experience delays in processing the payment request.

Payments can only be made if the Subrecipient has submitted a completed and approved application.

Exercise costs will not be reimbursed until an After Action Report (AAR)/Improvement Plan (IP) has been submitted to the Homeland Security Exercise and Evaluation Program (HSEEP), and a copy sent to your Program Representative.

Semi-Annual Drawdown Requirements

All Subrecipients should be reporting expenditures and requesting funds at least semi-annually throughout the period of performance. Semi-annual drawdowns should occur in March and October of each calendar year following final approval of the subaward application, with the exception of the final cash request, which must be submitted within 20 calendar days after the end of the period of performance.

Modifications

Post award budget, scope, and time modifications must be requested using the Cal OES FMFW V 1.19 signed by the Subrecipient's AA, and submitted to the Program Representative.

The Subrecipient may implement grant modification activities, and incur associated expenses, only after receiving written final approval of the modification from Cal OES.

Subrecipients must provide a written justification with all modification requests. The justification may be included in the body of the e-mail transmitting the request, or a document attached to the transmittal e-mail. Please reference GMM 2018-17 for additional information regarding modification requests.

Training Requirements

Training activities supported with EMPG Program funds should align to NPG core capabilities identified in each Subrecipients Training and Exercise Plan. Subrecipients must obtain a

**Training
Requirements
Cont.**

Training Feedback Number from Cal OES before beginning any training activities. This includes project components like travel to, materials for, or attendance in training courses. Training Feedback Numbers must be obtained no later than 30 days before the first day of the training or related activities. Subrecipients must complete a [Training Request Form](#) and submit it electronically to Cal OES.

For more information on this or other training-related inquiries, contact the [Cal OES Training Branch](#) at (916) 845-8752.

All EMPG-funded personnel, including M&A staff, and any staff being used for match, must complete one of the two following sets of training courses. Proof of completion of the training requirements must be kept on file by the Subrecipient and be made available for review upon request. When seeking approval of non-DHS/FEMA developed courses, course materials must be submitted with the approval requests. Conditional approvals are not offered.

EMPG TRAINING

IS 100 (any version), Introduction to Incident Command System (ICS)

IS 200 (any version), ICS for Single Resources and Initial Action Incident

IS 700 (any version), National Incident Management System, An Introduction

IS 800 (any version), National Response Framework, An Introduction

IS 120.c An Introduction to Exercises

IS 230.d Fundamentals of Emergency Management

IS 235.c Emergency Planning

IS 240.b Leadership and Influence

IS 241.b Decision Making and Problem Solving

IS 242.b Effective Communication

Training Requirements Cont.

IS 244.b Developing and Managing Volunteers

In the event that any of the listed courses have been updated and the required version is no longer available, it is acceptable to take the updated course in place of the listed course (i.e., since IS-120.a has been replaced with IS-120.C, the latter may be used in the place of the original course). The courses listed above are the minimum accepted versions for FY 2019 EMPG.

Exercises, Improvement Plans and After Action Reporting

Subrecipients should engage stakeholders to identify long-term training and exercise priorities. These priorities should address capability targets and gaps identified through the annual THIRA/SPR process, real-world events, previous exercises, and national areas for improvement identified in the NPR. It is recommended that exercises describe how they align to the [Principals' Strategic Priorities](#).

Subrecipients must report on all exercises conducted with EMPG grant funds. An AAR/IP or Summary Report (for Seminars & Workshops) must be completed and submitted to Cal OES within 90 days after the exercise/seminars/workshops are conducted. It is acceptable to submit an *Exercise Summary Report for Seminars and Workshops* in lieu of a full AAR/IP.

AAR/IPs and Summary Reports should be e-mailed to:

- hseep@fema.dhs.gov
- exercise@caloes.ca.gov
- Your Program Representative

All EMPG-funded personnel, including M&A staff and any staff being used for match, must participate in no less than three exercises between July 1, 2019, and June 30, 2021. Exercises used to meet this requirement during one period of performance cannot be used to meet the requirement in another. Extensions to the grant do not apply to this requirement or its deadline. There is no specific requirement for level of participation in the exercises and the exercises can be of any type.

For exercise-related issues and/or questions, please email the Cal OES Exercise Team at exercise@caloes.ca.gov.

Procurement Standards and Written Procedures

Subrecipients must conduct procurement utilizing either their own documented procurement standards and procedures, or the federal procurement standards found in 2 C.F.R. Part 200, whichever is more strict. Procurement standards must also contain a written conflict of interest policy which reflect applicable federal, state, local, and tribal laws.

Procurement Thresholds

Effective June 20, 2018, the micro-purchase threshold was increased from \$3,500 to \$10,000 and the simplified acquisition threshold was increased from \$150,000 to \$250,000. These increases apply to all Subrecipient procurements executed on or after June 20, 2018. Refer to [IB 434](#) for additional information.

Noncompetitive Procurement

To be eligible for reimbursement, noncompetitive procurements exceeding the simplified acquisition threshold require Cal OES prior written approval. This method of procurement must be approved by your local Purchasing Agent prior to submitting a request for Cal OES approval. A copy of the Purchasing Agent's approval must be included with submission. Cal OES may request additional documentation that supports the procurement effort.

Environmental Planning and Historic Preservation

DHS/FEMA is required to ensure all activities and programs that are funded by the agency comply with federal Environmental Planning and Historic Preservation (EHP) regulations.

Subrecipients proposing projects or activities (including, but not limited to, training, exercises, the installation of equipment, and construction or renovation projects) which have the potential to impact the environment or a historic structure must participate in the EHP review process. EHP Screening Memos must include detailed project information and explain the goals and objectives of the proposed project, and include supporting documentation.

DHS/FEMA may also require the Subrecipient provide a confidential California Historical Resources Information System (CHRIS) report in addition to the [EHP Screening Form](#).

Determination on the necessity of a CHRIS report is based upon information disclosed on the EHP Screening Form. Your Program Representative will provide you with additional instructions should this report be required. EHP requests should be submitted to Cal OES as early as possible. All projects/activities triggering EHP must receive DHS/FEMA

Environmental Planning and Historic Preservation Cont.

written approval prior to commencement of the funded activity.

Updated information may be referenced in the [FEMA GPD EHP Policy Guidance](#).

Construction and Renovation

When applying for construction funds, including communications towers, at the time of application, Subrecipients must submit evidence of approved zoning ordinances, architectural plans, any other locally required planning permits, and a notice of federal interest. Additionally, Subrecipients are required to submit a SF-424C Budget and Budget Detail that cites the project costs. Communications tower construction requests also require evidence the Federal Communications Commission's Section 106 review process has been completed.

Subrecipients using funds for construction projects must comply with the Davis-Bacon Act. Subrecipients 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.

Written approval for construction must be provided by DHS/FEMA prior to the use of any EMPG funds for construction or renovation.

Inventory Control and Property Management

FY 2019 EMPG Subrecipients must use standardized resource management concepts for resource typing and credentialing, in addition to maintaining an inventory by which to facilitate the effective identification, dispatch, deployment, tracking and recovery of resources.

Subrecipients must have an effective inventory management system, to include:

- Property records that document description, serial/ID number, fund source, title information, acquisition date, cost, federal cost share, location, use, condition, and ultimate disposition;
- Conducting a physical inventory at least every two years;

Inventory Control and Property Management Cont.

- A control system to prevent loss, damage, and theft of grant purchased equipment and supplies; and
- Adequate maintenance procedures must be developed to keep the property in good condition.

Equipment Disposition

When original or replacement equipment acquired under the EMPG is no longer needed for program activities, the Subrecipient must contact the Program Representative to request disposition instructions.

Performance Reporting

Subrecipients must complete a BSIR each Winter and Summer using the DHS/FEMA [Grants Reporting Tool](#) (GRT) for the duration of the subaward period of performance or until all grant activities are completed and the subaward is formally closed by Cal OES. Failure to submit a BSIR could result in subaward reduction, suspension, or termination.

Access to the BSIR may be obtained through the GRT. To create a new account, please click the link that reads, “Register for an account” and follow the instructions provided. The Subrecipient will be required to ensure up-to-date project information is entered. The Project Ledger in the FMFW may assist with the BSIR data entry process. For additional assistance with the GRT, please contact your Program Representative.

Subrecipients must prepare and submit Performance Reports to the State for the duration of the subaward period of performance, or until all grant activities are completed and the subaward is formally closed by Cal OES. The quarterly reports must include the progress made on identified activities, as well as other required information. Failure to submit a quarterly Performance Report could result in subaward reduction, suspension, or termination.

In order to ensure that mandated performance metrics and other data required under the subaward is reported accurately, all EMPG Performance Reports must first be submitted electronically, via email, to the Cal OES EMPG Program Representative for review and vetting. Electronic documents submitted for Cal OES review and vetting should be submitted as soon as possible, but no later than, seven (7) calendar days before the identified due date(s) associated with the Performance Report. Submission of the electronic copy is only to occur after the Cal OES EMPG Program

Performance Reporting Cont.

Representative's review has concluded and the Subrecipient is directed by their Cal OES EMPG Program Representative to submit the signed electronic copy.

Extension Requests

Extensions to the initial period of performance identified in the subaward will only be considered through formal, written requests to your Program Representative. Upon receipt of the extension request, Cal OES will:

1. Verify compliance with performance reporting requirements by confirming the Subrecipient has submitted all necessary performance reports;
2. Confirm the Subrecipient has provided sufficient justification for the request; and
3. If applicable, confirm the Subrecipient has demonstrated sufficient progress in past situations where an extension was authorized by Cal OES.

Extension requests will be granted only due to compelling legal, policy, or operational challenges, and will only be considered for the following reasons:

1. Contractual commitments with vendors that prevent completion of the project within the period of performance;
2. The project must undergo a complex environmental review which cannot be completed within this timeframe;
3. Projects are long-term by design and therefore; acceleration would compromise core programmatic goals; and
4. Where other special circumstances exist.

To be considered, extension requests must be received no later than 60 days prior to the end of the Subrecipient's period of performance, and must contain specific and compelling justifications as to why an extension is required. All extension requests must address the following:

1. Grant program, fiscal year, and award number;
2. Reason for delay;
3. Current status of the activity/activities;
4. Approved period of performance termination date and new project completion date;
5. Amount of funds drawn down to date;

Extension Requests Cont.

6. Remaining available funds, both federal and non-federal;
7. Budget outlining how remaining federal and non-federal funds will be expended;
8. Plan for completion, including milestones and timeframes for each milestone and the position/person responsible for implementing the plan for completion; and
9. Certification that the activity/activities will be completed within the extended period of performance without any modification to the original Statement of Work.

General questions regarding extension requirements and the Extension Request form should be directed to your Program Representative. For additional information, please see IB 379. Extension requests for personnel and salaries do not meet the requirements of IB 379 and will not be granted. Subrecipients are expected to complete all grant-funded personnel activity by the end of the subaward period of performance.

Progress Reports on Grant Extensions

All Subrecipients that receive Cal OES approval to extend their FY 2019 grant subaward period of performance may be required to submit progress reports indicating completed and future project milestones on all extended projects. Progress reports must be submitted electronically to the Program Representative. Deadlines for the submission of progress reports will be established at the time of extension approval.

Monitoring

Cal OES Grants Monitoring actively monitors Subrecipients, through day-to-day communications, programmatic site visits, and desk and on-site compliance assessments. The purpose of the compliance assessment is to ensure Subrecipients are in compliance with applicable state and federal regulations, grant guidelines, and programmatic requirements. Monitoring activities may include, but are not limited to:

- Verifying that entries recorded on the FMFW categories are properly supported with source documentation;
- Eligibility of and support for expenditures, typically covering two to three years of data;
- Comparing actual Subrecipient activities to those approved in the grant application and subsequent modifications, including the review of timesheets and invoices as applicable;

**Monitoring
Cont.**

- Procurements and contracts;
- Ensuring equipment lists are properly maintained and physical inventories are conducted;
- Ensuring advances have been disbursed in accordance with applicable guidelines; and
- Confirming compliance with:
 - Standard Assurances, and
 - Information provided on performance reports and payment requests

NOTE: It is the responsibility of all Subrecipients that pass down grant funds to other entities, to maintain and utilize a formal process to monitor the grant activities of their subawards. This requirement includes, but is not limited to, on-site verification of grant activities, as required. It is common for Subrecipients to receive findings in a programmatic site visit or compliance assessment, which require a Corrective Action Plan (CAP) to be submitted by Subrecipients. Those Subrecipients who fail to submit a CAP, as required, shall have a “hold” placed on any future reimbursements until the “finding” is resolved.

**Failure to
Submit
Required
Reports**

Periodic reporting is required by the grant. Subrecipients who miss a single reporting deadline may receive a letter addressed to their Board of Supervisors informing them of the failure to report. County OAs and tribes who fail to report twice in a row may have subsequent awards reduced by 10% until timely reporting is reestablished.

**Suspension/
Termination**

Cal OES may suspend or terminate grant funding, in whole or in part, or other measures may be imposed for any of the following reasons:

- Failure to submit required reports.
- Failure to expend funds in a timely manner consistent with the grant milestones, guidance, and assurances.
- Failure to comply with the requirements or statutory progress toward the goals or objectives of federal or state law.
- Failure to make satisfactory progress toward the goals or objectives set forth in the Subrecipient application.
- Failure to follow Grant Subaward requirements or Special Conditions.

**Suspension/
Termination
Cont.**

- Proposing or implementing substantial plan changes to the extent that, if originally submitted, the application would not have been selected for funding.
- False certification in the application or document.
- Failure to adequately manage, monitor, or direct the grant funding activities of their Subrecipients.

Before taking action, Cal OES will provide the Subrecipient reasonable notice of intent to impose corrective measures and will make every effort to informally resolve the problem.

Closeout

Cal OES will close-out Subrecipient awards when it determines all applicable administrative actions and all required work of the federal award have been completed. Subawards will be closed after:

- Receiving any applicable Subrecipient Performance Report indicating all approved work has been completed, and all funds have been distributed;
- All funds have been requested and reimbursed, or disencumbered;
- Completing a review to confirm the accuracy of reported information;
- Reconciling actual costs to subawards, modifications and payments; and
- Verifying the Subrecipient has submitted a final BSIR showing all grant funds have been expended.

**Records
Retention**

The records retention period is three years from the date of the Subrecipient's final BSIR submittal showing all grant funds have been expended, or until any pending litigation, claim, or audit started before the expiration of the three-year retention period has been resolved and final action is taken. The Cal OES Grant Closeout Letter will notify the Subrecipient of the start of the records retention period for all programmatic and financial grant-related records. If the SAA award remains open after the Subrecipient's submission of the final BSIR, Cal OES will complete any additional BSIR reporting required under the award on behalf of the Subrecipient.

**Records
Retention
Cont.**

Closed grants may still be monitored and audited. Failure to maintain all grant records for the required retention period could result in a reduction of grant funds, and an invoice to return costs associated with the unsupported activities. If documents are retained longer than the required retention period, FEMA, the DHS Office of Inspector General, Government Accountability Office, and pass-through entity have the right to access these records as well. See Title 2, C.F.R. §§ 200.333, 200.336.

Attachment A – FY 2019 EMPG Allocations | 2019

Operational Area	Population	Base Amount	Per Capita Total	Total Award
ALAMEDA	1,660,202	\$125,000	\$335,021	\$460,021
ALPINE	1,154	\$125,000	\$233	\$125,233
AMADOR	38,094	\$125,000	\$7,687	\$132,687
BUTTE	227,621	\$125,000	\$45,933	\$170,933
CALAVERAS	45,157	\$125,000	\$9,112	\$134,112
COLUSA	22,098	\$125,000	\$4,460	\$129,460
CONTRA COSTA	1,149,363	\$125,000	\$231,936	\$356,936
DEL NORTE	27,221	\$125,000	\$5,493	\$130,493
EL DORADO	188,399	\$125,000	\$38,018	\$163,018
FRESNO	1,007,229	\$125,000	\$203,254	\$328,254
GLENN	28,796	\$125,000	\$5,811	\$130,811
HUMBOLDT	136,002	\$125,000	\$27,445	\$152,445
IMPERIAL	190,624	\$125,000	\$38,467	\$163,467
INYO	18,577	\$125,000	\$3,748	\$128,748
KERN	905,801	\$125,000	\$182,787	\$307,787
KINGS	151,662	\$125,000	\$30,605	\$155,605
LAKE	65,081	\$125,000	\$13,133	\$138,133
LASSEN	30,911	\$125,000	\$6,237	\$131,237
LOS ANGELES	10,283,729	\$125,000	\$2,075,209	\$2,200,209
MADERA	158,894	\$125,000	\$32,064	\$157,064
MARIN	263,886	\$125,000	\$53,251	\$178,251
MARIPOSA	18,129	\$125,000	\$3,658	\$128,658
MENDOCINO	89,299	\$125,000	\$18,021	\$143,021
MERCED	279,977	\$125,000	\$56,498	\$181,498
MODOC	9,612	\$125,000	\$1,939	\$126,939
MONO	13,822	\$125,000	\$2,790	\$127,790
MONTEREY	443,281	\$125,000	\$89,452	\$214,452
NAPA	141,294	\$125,000	\$28,512	\$153,512
NEVADA	99,155	\$125,000	\$20,009	\$145,009
ORANGE	3,221,103	\$125,000	\$650,004	\$775,004
PLACER	389,532	\$125,000	\$78,605	\$203,605
PLUMAS	19,773	\$125,000	\$3,991	\$128,991
RIVERSIDE	2,415,955	\$125,000	\$487,528	\$612,528
SACRAMENTO	1,529,501	\$125,000	\$308,646	\$433,646
SAN BENITO	57,088	\$125,000	\$11,520	\$136,520
SAN BERNARDINO	2,174,938	\$125,000	\$438,893	\$563,893
SAN DIEGO	3,337,456	\$125,000	\$673,483	\$798,483
SAN FRANCISCO	883,963	\$125,000	\$178,380	\$303,380
SAN JOAQUIN	758,744	\$125,000	\$153,111	\$278,111

Attachment A – FY 2019 EMPG Allocations | 2019

Operational Area	Population	Base Amount	Per Capita Total	Total Award
SAN LUIS OBISPO	280,101	\$125,000	\$56,523	\$181,523
SAN MATEO	774,155	\$125,000	\$156,221	\$281,221
SANTA BARBARA	453,457	\$125,000	\$91,505	\$216,505
SANTA CLARA	1,956,598	\$125,000	\$394,832	\$519,832
SANTA CRUZ	276,864	\$125,000	\$55,870	\$180,870
SHASTA	178,271	\$125,000	\$35,975	\$160,975
SIERRA	3,207	\$125,000	\$647	\$125,647
SISKIYOU	44,612	\$125,000	\$9,002	\$134,002
SOLANO	439,793	\$125,000	\$88,748	\$213,748
SONOMA	503,332	\$125,000	\$101,571	\$226,571
STANISLAUS	555,624	\$125,000	\$112,122	\$237,122
SUTTER	97,238	\$125,000	\$19,622	\$144,622
TEHAMA	64,039	\$125,000	\$12,923	\$137,923
TRINITY	13,635	\$125,000	\$2,751	\$127,751
TULARE	475,834	\$125,000	\$96,021	\$221,021
TUOLUMNE	54,740	\$125,000	\$11,047	\$136,047
VENTURA	859,073	\$125,000	\$173,357	\$298,357
YOLO	221,270	\$125,000	\$44,651	\$169,651
YUBA	74,727	\$125,000	\$15,079	\$140,079
TRIBAL NATIONS	362,801	\$125,000	\$73,212	\$198,212
TOTAL	40,172,494	\$7,375,000	\$8,106,623	\$15,481,623

Attachment B – FY 2019 EMPG Timeline | 2019

DHS Announcement of FY 2019 EMPG NOFO	April 12, 2019
Cal OES Application due to DHS	May 29, 2019
DHS/FEMA Award to California	September 9, 2019
Subrecipient period of performance begins	July 1, 2019
FY 2019 EMPG California Supplement release	September 2019
Notification of Subrecipient Award	September 2019*
Subrecipient Workshops	September 2019
Multi Year-Training and Exercise Plans due	September 30, 2019
Submission of the FY 2019 EMPG Performance Report for the period of 7/1/2019 – 9/30/2019	October 16, 2019
Subrecipient Final Applications due to Cal OES	December 6, 2019*
All FY 2019 EMPG EHP-related documents must be received by Program Representative	December 31, 2019
Submission of the FY 2019 EMPG Performance Report for the period of 7/1/2019 – 12/31/2019	January 16, 2020
Submission of the FY 2019 EMPG Performance Report for the period of 7/1/2019 – 3/31/2020	April 16, 2020
Submission of the FY 2019 EMPG Performance Report for the period of 7/1/2019 – 6/30/2020	July 16, 2020
Submission of the FY 2019 EMPG Performance Report for the period of 7/1/2019 – 9/30/2020	October 16, 2020
Submission of the FY 2019 EMPG Performance Report for the period of 7/1/2019 – 12/31/2020	January 15, 2021
Submission of the FY 2019 EMPG Performance Report for the period of 7/1/2019 – 3/31/2021	April 16, 2021
Subrecipient period of performance ends	June 30, 2021
Submission of the FY 2019 EMPG Performance Report for the period of 7/1/2019 – 6/30/2021	July 20, 2021
Final Request for Reimbursement due	Within 20 calendar days of the subaward expiration date
Cal OES's period of performance ends	September 30, 2021

*Dates are approximate and based on anticipated date of DHS award to California

Attachment C – FY 2019 EMPG Program Checklist | 2019

Subrecipient: _____ **FIPS#:** _____

Program Representative: _____

Financial Management Forms Workbook:

- _____ Grant Subaward Face Sheet
- _____ Authorized Agent and Contact
- _____ Project Ledger
- _____ Planning Ledger
- _____ Organization Ledger
- _____ Equipment Ledger
- _____ Training Ledger
- _____ Exercise Ledger
- _____ Management and Administration Ledger
- _____ Indirect Cost Ledger
- _____ Consultant-Contractor Ledger
- _____ Personnel Ledger
- _____ Match Ledger
- _____ Indirect Cost Rate Summary (If Applicable)
- _____ Authorized Agent Sheet

Required Documents:

- _____ Original Counter-signed Award Letter
- _____ EHP Screening Form
- _____ FFATA Financial Disclosure
- _____ Certification Regarding Lobbying
- _____ Governing Body Resolution
- _____ Subrecipient Grants Management Assessment form
- _____ 2019 EMPG Standard Assurances
- _____ Indirect Cost Rate Agreement (If Applicable)