



GRANT MANAGEMENT MEMORANDUM GMM 2021-05

Date: July 16, 2021

To: All California Governor's Office of Emergency Services (Cal OES)
Homeland Security Grant Program (HSGP) Subrecipients

From: Cal OES Grants Management

Subject: Streamlined Noncompetitive Procurement Authorization Process for Single-Source HSGP Training

Introduction

To ensure that Homeland Security Grant Program funds used for the procurement of goods and services are spent in accordance with grant rules and federal regulations, this Memorandum provides additional guidance for required single source approvals of Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA) Emergency Management Institute (EMI) courses and California Specialized Training Institute (CSTI) Single Source Provider courses.

Per GMM-2017-01-A, Cal OES will not reimburse for any noncompetitive procurement of training, regardless of the cost. Exceptions to this policy are allowable under certain circumstances and are determined on a case-by-case basis. Per 2 CFR 200.320(c)(2), solicitation of a proposal from only one source may be used if the item is only available from a single provider. Certain FEMA EMI and DHS approved "G" designation, Terrorism Liaison Officer (TLO), and other single source courses meet this criterion. While a Cal OES Request for Noncompetitive Procurement Authorization form must still be used to obtain Cal OES advance approval for these courses, subrecipients are not required to go through a formal competitive bidding process for the specific courses listed at [Single Source Courses](#).

"G" Designation, TLO, and Other Single Source Courses

FEMA delegated authority to Cal OES, as the State Administrative Agency (SAA), to conduct DHS approved emergency management courses that generally can only be offered by the federal government. As the training, exercise, and education branch for Cal OES, CSTI serves as the single authorized provider for

the FEMA EMI field delivery courses for states, tribal nations, and territories in support of California's emergency management credentialing and certification programs. These courses are distinguished by a "G" designation in the class number and are listed at the Cal OES website: [Single Source Courses](#). Additional courses addressing CSTI's own curriculum are also listed. Courses utilized by the State Threat Assessment System in support of the Terrorism Liaison Officer (TLO) program are further listed as single source providers; these courses and other single source providers have been approved by DHS/FEMA.

Exceptions to "G" Designation Courses

Four "G" courses have been authorized by CSTI to be taught by "Outreach Instructors," who have been trained and verified for this role. These four courses are not considered "single source" since many instructors are authorized to provide these courses. The four courses are: G-191, G-611, G-626E, and G-775. Subrecipients seeking to procure these four courses must undergo a competitive procurement process. Courses conducted by an authorized Outreach Instructor that yields a CSTI certificate of completion must meet the applicable course budget guidelines. This includes monitoring the maximum hourly rate of instruction and course delivery, including coordination costs.

Instructions for Filling Out Request for Noncompetitive Procurement Authorization

When completing the Cal OES Request for Noncompetitive Procurement Authorization form, the Subrecipient should include one of the following statements in their response to Question 6:

- For "G" or CSTI-specific courses in support of California's emergency management credentialing and certification programs (that are not one of the four exceptions), include the following statement:

This is a DHS/FEMA Emergency Management Institute (EMI) or Cal OES-specific course that is only authorized to be presented in California by the California Specialized Training Institute.

- For DHS/FEMA approved courses used by the State Threat Assessment System in support of the TLO Program and other single source courses, include the following statement:

This is a DHS/FEMA approved course that is only authorized to be presented by the provider designated in the course materials.

A screenshot of the Cal OES web page listing the course should be attached to the form. Language contained in the course listing may be used in response to Question 6.

Conclusion

This Memorandum is intended to provide further guidance on Cal OES's single source approval process for Subrecipients' procurement of abovementioned courses with Homeland Security Grant Program funds. Subrecipients are still responsible for working with their purchasing department to ensure that procurements funded by federal awards conform to local requirements and the requirements set forth under 2 CFR 200, Sections 200.318 – 200.327. General grant-related procurement questions should be directed to your Cal OES Program Representative. Course-related questions may be directed to CSTI at the contact information located on the website referenced above.