



**GRANT MANAGEMENT MEMORANDUM
GMM-2017-01-A**

Date: June 29, 2017

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

From: Cal OES Grants Management

Subject: Terrorism-Related Training Requirements – Homeland Security Grant Program (HSGP)

[This Memorandum provides clarification to GMM-2017-01.](#) As the State Administrative Agency (SAA) and the steward of both federal and state funds, it is Cal OES's responsibility for ensuring that the state is utilizing its grant funds appropriately and cost-effectively. In this regard, Cal OES is seeking to increase efficiencies and reduce duplication of effort in the delivery of Homeland Security-related training.

This Grant Management Memorandum (GMM) is to remind all subrecipients that Fusion Center personnel are responsible for providing course instruction for Terrorism Liaison Officer (TLO) Basic training. Therefore, consultant instructor costs associated with presenting this course are not an eligible expense for reimbursement, and Cal OES will no longer reimburse the Fusion Centers (or more specifically, their fiduciary agency) for the cost of a contracted presenter for this course.

Please be advised that:

1. All future requests for feedback numbers for the TLO Basic course *to be conducted by contractors* will not be accepted. [This does not apply to contractors working on a regular basis performing day-to-day work as part of the existing workforce of the fusion centers.](#)
2. Costs associated with contractors whose responsibilities are intended to assist with and/or coordinate TLO training efforts (locally or statewide) will not be eligible for reimbursement. [For example, it is not appropriate to hire a contractor who then subcontracts with instructors to provide the training, as this practice increases the overall costs. Rather, the contractor who will be conducting the training should be awarded the contract as part of a competitive bidding process based on a fixed rate.](#)
3. In order for other costs associated with the delivery of the TLO Basic course to remain eligible for reimbursement, e.g., supplies, travel, etc., training feedback numbers will continue to be required and will be provided for Fusion Center-conducted TLO Basic courses only.
4. Courses conducted by a Peace Officer Standards & Training (POST) certified instructor for which tuition is charged that yield a POST certificate of completion must meet the Requirements for Course Budget as established in the POST Administrative Manual.

These guidelines set forth the maximum hourly rate of instructional and course delivery and coordination costs. Costs for the delivery of tuition-free POST certified courses that exceed those stipulated in the POST Administrative Manual must be reasonable and include sufficient details regarding the competitive bidding process following local, state and federal procurement regulations, and be pre-approved by Cal OES for grant funding.

5. Cal OES will not reimburse for any sole source contracts for any *terrorism-related training, regardless of the cost of the training*. Exceptions to this policy may be approved in limited circumstances, e.g., related to a procurement effort that has resulted in inadequate competition. The Cal OES Request for Noncompetitive Procurement Authorization form is to be used; advance approval is required.

Costs for all terrorism-related training (including the TLO Basic course) covered by contracts that have been executed on or before the date of this GMM, that have been procured following local, state and federal procurement regulations and grant guidelines, will be accepted for reimbursement by Cal OES for courses that are conducted through the fiscal year ending June 30, 2017. Verification of the procurement process and local contract approval may be requested by Cal OES prior to authorizing approval and/or reimbursement of the course.

Exceptions to this guidance may be approved if extenuating circumstances can be demonstrated, e.g., those related to cancellation clauses in existing contracts. Please note that excessive charges for training may be considered unreasonable, ineligible and/or questioned under future external audits of the HSGP awards.

As stipulated in the California Supplement to the HSGP Notice of Funding Opportunity, all grant training activities must receive Cal OES approval prior to starting the training event.

General questions regarding training requirements should be directed to your Cal OES Program Representative or to the Cal OES Training Branch. Fusion Center questions regarding TLO training should be directed to the State Threat Assessment Center [Commander](#).