



***Cal* OES**

**GOVERNOR'S OFFICE
OF EMERGENCY SERVICES**

**Fiscal Year 2018
Nonprofit Security Grant Program**

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

October 2018

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Director's Message

California's community organizations face an ever growing threat where individuals are becoming radicalized and are willing to carry out attacks. We have experienced unprecedented levels of violence, threats of terrorism, and hate crimes against our community partners in the past year. With the continued support from our federal partners, we look forward to enhancing physical security efforts of our local communities and the safeguarding of our infrastructure within the State from threats of terrorism.

I continue to promote values that include Integrity, Service, Respect, and Resiliency from within Cal OES to better serve our Nonprofit Security Grant Program partners. I believe in maximizing our resource capabilities and technical expertise in order to serve as the ultimate, interoperable force multiplier for any community impacted by threats of terrorism.

NSGP continues to build on our partnerships throughout the State, and it is our task, together, to ensure our efforts provide the necessary resources to aid Californians. We will continue to strengthen our capabilities through assessing capability gaps and addressing immediate and long-term homeland security needs, in an effort to improve our ability to protect our State from the variety of threats it may face.

To that end, I announce the California Governor's Office of Emergency Services *Fiscal Year 2018 Nonprofit Security Grant Program California Supplement to the Federal Notice of Funding Opportunity*.

Sincerely,



MARK S. GHILARDUCCI
Director

Federal Notice of Funding Opportunity Announcement	<p>In May 2018, the U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA) issued the Fiscal Year (FY) 2018 Nonprofit Security Grant Program (NSGP), Notice of Funding Opportunity (NOFO) found on the California Governor’s Office of Emergency Services (Cal OES) and FEMA websites and is available for download at https://www.fema.gov/media-library-data/1526585999645-b157aa32e8dda49c604e82c6202b6d7e/FY_2018_NSGP_NOFO_051718_508.pdf. Subrecipients must follow the programmatic requirements set forth in the NOFO, 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. IBs may be obtained at: https://www.fema.gov/grants/grant-programs-directorate-information-bulletins.</p>
Purpose of the California Supplement	<p>The FY 2018 NSGP California Supplement to the NOFO (State Supplement) is intended to complement, rather than replace, the NOFO published by DHS. It is recommended Applicants thoroughly read the NOFO before referring to the State Supplement. The State Supplement will emphasize differences between the FY 2017 and FY 2018 NSGP, and highlight additional California policies and requirements applicable to the FY 2018 NSGP.</p>
Key Changes to the FY 2018 Nonprofit Security Grant Program	<ul style="list-style-type: none"> • The Federal Funding Accountability and Transparency Act (FFATA) Financial Disclosure is now incorporated as an attachment to be included with the required application documents. It is no longer a part of the Financial Management Forms Workbook (FMFW). • In lieu of requesting a 501(c)(3) letter or self-declaration letter, Cal OES has instituted the use of a 501(c)(3) Certification form, requesting Subrecipients to certify and acknowledge if they are required by the Internal Revenue Service to have a 501(c)(3) Determination Letter. The form is now incorporated as an attachment to be included with the required application documents. • Nonprofits are encouraged to apply for additional costs including security training for all nonprofit staff, planning related costs, and exercise-related costs, in addition to allowable equipment.

Grant Management Memoranda Cal OES issues Grant Management Memoranda (GMMs) that provide additional information and requirements regarding NSGP funds. GMMs can be located at: <http://www.caloes.ca.gov/cal-oes-divisions/grants-management/homeland-security-prop-1b-grant-programs/memos>.

Eligible Subrecipients Eligible Applicants, referred to as Subrecipients, are nonprofit organizations that are described under Section 501(c)(3) of the Internal Revenue Code of 1986.

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.

Debarred/ Suspended Parties Subrecipients must not make or permit any award (subgrant, 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. Subrecipients must obtain documentation of eligibility prior to making any subaward or contract funded by NSGP funds, and must be prepared to present supporting documentation 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 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.

FY 2018 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.

NSGP will focus on building and sustaining core capabilities, strengthen governance integration between private Nonprofit entities and Federal, State, and Local Government, and encourage a whole community approach to security and emergency management in the following areas:

- Planning
- Equipment Acquisitions
- Training
- Exercises

NSGP seeks to integrate the preparedness activities of nonprofit organizations which are at high risk of a terrorist attack with broader State and Local preparedness efforts.

Management and Administration

The Management and Administration (M&A) allowance for Subrecipients is set at a maximum of 5% for the FY 2018 NSGP.

Indirect Costs

Indirect costs are allowable under the FY 2018 NSGP 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

**Indirect Costs
Cont.**

in the FMFW on the indirect cost category ledger if being claimed under the award. Indirect costs may be claimed no more than once annually, and only at the end of the fiscal year. Costs must be broken out by fiscal year if there is a rate change. Indirect costs must be based on claimed direct costs, excluding equipment expenditures.

**Equipment
Maintenance/
Sustainment**

Use of NSGP funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable as described in FEMA IB 379.

**Access and
Functional
Needs
Population**

Subrecipients conducting major planning projects (including, but not limited to Evacuation, Mass Care and Shelter, Disaster Recovery, etc.) should address access and functional needs, including the needs of children, within their planning documents in order to maintain NSGP eligibility.

**Conflict of
Interest**

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 NSGP subaward within five days of learning of the conflict of interest.

Financial Management Forms Workbook

The FY 2018 Cal OES FMFW can be accessed at <http://www.caloes.ca.gov/cal-oes-divisions/grants-management/grants-processing-programs/homeland-security-grants-processing> and 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 Body of 5 – Provide the contact information of any additional Authorized Agents (AA) and staff related to grant activities. It is recommended more than one person be designated as the AA so if one AA is not available, a second 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 and Grant Subaward Modifications, and to assist with completion of the Biannual Strategy Implementation Report (BSIR).

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

Equipment Ledger – It is an NSGP requirement that detailed information be provided under the equipment description for all grant-funded equipment. Authorized Equipment List (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 form to obtain a Training Feedback number may be found at the following link:
<https://w3.calema.ca.gov/WebPage/trainreq.nsf/TrainRequest?OpenForm>

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.

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

Authorized Agent Page – The AA Page must be submitted with the application, all Cash Requests, Cash Advances, and Grant Subaward Modifications. The AA must include the appropriate signature, expenditure period, 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, found as Attachment A, 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. A PDF fillable version of the form may be found at: <http://www.caloes.ca.gov/cal-oes-divisions/grants-management/homeland-security-prop-1b-grant-programs/homeland-security-grants-program>.

Narrative Attachments

501(c)(3) Certification form – The 501(c)(3) Certification form, referenced as Attachment B, requests Subrecipients to certify and acknowledge if they are required by the Internal Revenue Service to have a 501(c)(3) Determination Letter.

STD 204 Payee Data Record – A form used to assign an organization a Federal Information Processing Standard (FIPS) number.

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, referenced as Attachment C, to provide information required by the FFATA of 2006. If your organization is not subject to the FFATA Financial Disclosure requirements, check the "Not Subject to FFATA Financial Disclosure" box at the bottom of the page.

Grant Assurances

The Grant 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 2018 Grant Assurances as part of their FY 2018 NSGP application. The required Grant Assurances can be found only in PDF format on the Cal OES website.

NOTE: Self-created Grant 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 2018 GBR with their application. A Sample Governing Body Resolution is found as Attachment D.

Authorized Agent Information

For each person or position appointed by the governing body, identify the individual in the Authorized Body of 5 page of the FMFW.

Required Documents Submission

Subrecipients must submit an electronic copy of their completed FMFW to their Program Representative for review. After the required documents are approved, a completed hardcopy of the FMFW, along with the required documents must be mailed, with original signatures, by the application due date. The completed required documents should be received by Cal OES within 45 days of receiving the Notification of Subaward Approval letter. If it is determined you no longer want to accept the subaward, inform your Program Representative as soon as possible. The FY 2018 NSGP Timeline is referenced as Attachment E.

HAND-DELIVERED DOCUMENTS WILL NOT BE ACCEPTED

Late or Incomplete Required Documents

Late or incomplete required documents may be denied. If required documents are incomplete, the Program Representative may request additional information. Requests for late submission of required documents must be made in writing to the Program Representative prior to the due date. Cal OES has sole discretion to accept or reject late or incomplete required documents. All required documents requiring an original signature must be mailed in hardcopy.

NSGP Contact Information

All Subrecipient required documents, questions, comments, and correspondence should be directed to:

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

Renee Jackson, Chief (916) 845-8404
Debbie Phillips (916) 845-8746
Nick Murray (916) 845-8405
Scott Sano (916) 845-8408
Tim Reed (916) 845-8662

Subaward Approval

The Subrecipient will receive written notice of the State's approval of its grant subaward not later than 45 days after Cal OES receives the Federal Grant Award. Subrecipient reimbursements will not be made until all required documents have been approved by Cal OES.

Payment Request Process To request an advance or cash reimbursement payment of FY 2018 NSGP funds, Subrecipients must first complete a payment request using the Cal OES FMFW V1.18, 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) has been submitted to your Program Representative.

Advances and Interest Earned on Advances Advance payment means a payment is requested before Subrecipients have disbursed the funds for program purposes. Subrecipients may be paid an advance, provided they maintain a willingness and ability to maintain procedures to minimize the time elapsing between the receipt of funds and their disbursement.

Federal rules require advances to be deposited in interest-bearing accounts. Interest earned amounts up to \$500 per year may be retained by Subrecipients for administrative expense; any additional interest earned on federal advance payments must be returned annually to Cal OES.

Semi-Annual Drawdown Requirements All Subrecipients should be reporting expenditures and requesting funds at least semi-annually throughout the performance period. Semi-annual drawdowns should be occurring 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 of the end of the subaward performance period.

Modifications Post award budget, scope and time modifications must be requested using the Cal OES FMFW V 1.18, 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.

Adding or eliminating equipment found in the Investment Justification (IJ) must be requested in writing. Cal OES will review the request and forward to FEMA for approval.

Refer to 2 C.F.R. § 200.308 for additional information on Revision

Modifications Cont.

of Budget and Program Plans.

DHS/FEMA will generally not approve change of scope requests resulting from the following situations:

- Subrecipients that relocate their facilities after submitting their application who are requesting a change of scope to allow them to use NSGP funds towards projects at the new facility; or
- Subrecipients that renovate their facilities after submitting their application in cases where the subsequent renovations would affect the vulnerability/risk assessment upon which the IJ is based.

Training

All grant training activities must receive Cal OES approval prior to starting the training event. Allowable training-related costs under FY 2018 NSGP are limited to attendance fees for the training, and related expenses, such as materials, supplies, and/or equipment. No personnel costs, such as overtime and backfill costs, associated with attending the training courses are allowable. Travel costs are also not eligible. Training projects must be proposed in the IJ and must be presented by a pre-approved training provider. If the Applicant is selected for an award, they must obtain proof of approval via a feedback number.

When seeking approval of non-DHS/FEMA developed courses, course materials must be submitted with the approval requests. Conditional approvals are not offered.

For more information on this or other training-related inquiries, contact the Cal OES Training Branch at (916) 845-8752 or their website at: <http://www.caloes.ca.gov/Cal-OES-Divisions/California-Specialized-Training-Institute>.

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 Threat and Hazard Identification and Risk Assessment and Stakeholder Preparedness Review process, real-world events, previous exercises, and national areas for improvement identified in the NPR.

Subrecipients must report on all exercises conducted with NSGP grant funds. An AAR and Improvement Plan (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

Exercises, Improvement Plans and After Action Reporting Cont.

submit an *Exercise Summary Report for Seminars and Workshops* in lieu of a full AAR/IP.

Please ensure all AAR/IP or Summary Report documents are encrypted (password-protected) and the password and a copy of the AAR/IP or Summary Report is emailed to hseep@fema.dhs.gov and Program Representative via separate emails. For exercise-related issues and/or questions, please email the Cal OES Exercise Team at exercise@caloes.ca.gov.

Noncompetitive Procurements

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 which supports the procurement effort.

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.

Planning

NSGP funding may be used for security or emergency planning expenses and the materials required to conduct planning activities. Planning must be related to the protection of the facility and the people within the facility and should include those with access and functional needs as well as those with limited English proficiency. Examples of planning activities allowable under this Program include:

- Development and enhancement of security plans and protocols
- Development or further strengthening of security assessments
- Emergency contingency plans
- Evacuation/Shelter-in-place plans
- Other project planning activities with prior approval from DHS/FEMA

Environmental Planning and Historic Preservation

DHS/FEMA is required to ensure all activities and programs 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 must participate in the EHP review process. EHP Screening Memos must include detailed project

**Environmental
Planning and
Historic
Preservation
Cont.**

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 written approval prior to commencement of the funded activity. The EHP Screening Form is at: <http://www.caloes.ca.gov/cal-oes-divisions/grants-management/homeland-security-prop-1b-grant-programs/homeland-security-grants-program>.

Updated information on Grants Program Directorate (GPD) EHP FEMA Policy #108-023-1 can be accessed at: <https://www.fema.gov/grant-programs-directorate-policy>.

**Construction
and
Renovation**

Project construction using NSGP funds may not exceed the greater of \$1,000,000 or 15% of the Grant Subaward. (For the purposes of the limitations on funding levels, communications towers are not considered construction). 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.

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

**Eligible
Equipment
Costs**

Equipment costs are limited to only two categories from the FY 2018 AEL. Those categories are Physical Security Enhancement Equipment (Category 14), and Inspection and Screening Systems (Category 15). Allowable NSGP equipment is located on the AEL website and is found here at: <https://www.fema.gov/authorized-equipment-list>.

Inventory Control and Property Management

FY 2018 NSGP 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 number or other ID, title information, acquisition date, cost, location, use and condition, and ultimate disposition;
- Conducting a physical inventory at least every two years;
- 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 NSGP 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 performance period 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, termination, or suspension.

To obtain access to the online GRT, please log on the DHS/FEMA website at <https://www.reporting.odp.dhs.gov>. To create a new account, please follow the instructions that read, "If you need to register for an account, please click here." The Subrecipient will be required to ensure up-to-date project information is entered. For additional assistance with the GRT, please contact your Program Representative.

Extension Requests

Extensions to the initial performance period 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 that 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 performance period;
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 performance period, 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 performance period termination date and new project completion date;
5. Amount of funds drawn down to date;
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 performance period without any modification to the original Statement of Work.

General questions regarding extension requirements should be directed to your Program Representative. For additional information, please see IB 379 at: <https://www.fema.gov/pdf/government/grant/bulletins/info379.pdf>. Extension requests for personnel and salaries do not meet the requirements of IB 379 and will not be granted. Subrecipients are

Extension Requests Cont.

expected to complete all grant-funded personnel activity by the end of the subaward performance period.

Progress Reports on Grant Extensions

All Subrecipients that receive Cal OES approval to extend their FY 2018 grant subaward performance period 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, both through desk and on-site field reviews. Monitoring is based on the cost principals and administrative requirements addressed in Local, State, and federal controlling authority, in addition to applicable financial guidelines. Reviews may include, but are not limited to:

- Entries recorded on the FMFW categories;
- 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 as appropriate;
- Ensuring advances have been disbursed in accordance with applicable guidelines;
- Confirming compliance with:
 - Grant Assurances, and
 - Information provided on performance reports and payment requests.

NOTE: It is the responsibility of all Subrecipients that pass through funds to monitor and audit the grant activities of their subawards. This requirement includes, but is not limited to, on-site verification of grant activities, as required. Many Subrecipients receive “findings” which necessitate a Corrective Action Plan (CAP) on their part. 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 Governing Body informing them of the failure to report. Subrecipients 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 agreement requirements or special conditions.
- 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 closeout 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 that 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. 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 State

Records Retention Cont.

Administrative Agency 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. 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.

Warranty

In accordance with FEMA IB #336, Maintenance Contracts and Warranty Coverage Funded by Preparedness Grants:

- If purchasing maintenance agreement/service contract/extended warranty, it must not extend beyond the performance period of the grant, to which the contract is being charged, unless
- The maintenance agreement/service contract/extended warranty is purchased incidental (i.e. at the same time under the same Grant Subaward) to the original purchase of the system or equipment; Subrecipients may procure maintenance or warranty coverage which exceeds the performance period.

Competition

In accordance with 2 C.F.R. § 200.319, all procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section. Follow the State or your own written procurement policies, whichever is more restrictive. If you follow your policies, they must meet the following minimum requirements:

- Obtain a minimum of two written (signed and dated) bids from vendors.
- Keep a written record of the following: WHO you contacted, WHEN you contacted them, WHAT prices were quoted, and WHY you selected the vendor. The records must include all bids.

Vendor Licensing

The State of California, Contractor's State License Board (CSLB) requires that anyone charging \$500 or more to perform construction work must be licensed. Please make sure your contractor possesses the correct license certification and is qualified to install your equipment. Check a contractor's license number online at www.cslb.ca.gov or by calling (800) 321-2752 (CSLB). Contractors are required to place their license number on their business cards, bids, and contracts.

Bids, Estimates, and Invoices

Bids and invoices must include the following:

- Contractor/service provider's License Number;
- Invoice/estimate number;
- Make – (manufacturer/brand name);
- Model – (manufacturer's model name and number);
- Quantity – (amount purchased);
- Unit cost – (dollar amount per item);
- Any miscellaneous/installation equipment should be listed separately and include the details such as: quantity ordered and price per unit;
- Labor/installation cost should be listed separately and detailed including price per hour per person;
- State/local taxes should be listed separately.

Bids and invoices must be issued by the vendor who installed the equipment or performed the service. Bids and Invoices may not be created by the Subrecipient or representatives of the Subrecipient. Costs must be allowable according to 2 C.F.R. § 200.403, § 200.404, and § 200.405.

**CALIFORNIA GOVERNOR'S OFFICE OF EMERGENCY SERVICES
SUBRECIPIENT GRANTS MANAGEMENT ASSESSMENT**

Subrecipient:	DUNS #:	FIPS #:
Grant Disaster/Program Title:		
Performance Period:	to	Subaward Amount Requested:
Type of Non-Federal Entity (Check Box) <input type="checkbox"/> State Gov. <input type="checkbox"/> Local Gov. <input type="checkbox"/> JPA <input type="checkbox"/> Non-Profit <input type="checkbox"/> Tribe		

Per Title 2 CFR § 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. This assessment is made in order to determine and provide an appropriate level of technical assistance, training, and grant oversight to subrecipients for the award referenced above.

The following are questions related to your organization's experience in the management of federal grant awards. This questionnaire must be completed and returned with your grant application materials.

For purposes of completing this questionnaire, *grant manager* is the individual who has primary responsibility for day-to-day administration of the grant, *bookkeeper/accounting staff* means the individual who has responsibility for reviewing and determining expenditures to be charged to the grant award, and *organization* refers to the subrecipient applying for the award, and/or the governmental implementing agency, as applicable.

Assessment Factors	Response
1. How many years of experience does your current grant manager have managing grants?	
2. How many years of experience does your current bookkeeper/accounting staff have managing grants?	
3. How many grants does your organization currently receive?	
4. What is the approximate total dollar amount of all grants you receive?	
5. Are individual staff members assigned to work on multiple grants?	
6. Do you use timesheets to track the time staff spend working on activities/projects?	
7. How often does your organization have a financial audit?	
8. Has your organization received any audit findings in the last three years?	
9. Do you have a written plan to charge costs to grants?	
10. Do you have written procurement policies?	
11. Do you get multiple quotes or bids when buying items or services?	
12. How many years do you maintain receipts, deposits, cancelled checks, invoices, etc.?	
13. Do you have procedures to monitor grant funds passed through to other entities?	

Certification: <i>This is to certify that, to the best of our knowledge and belief, the data furnished above is accurate, complete and current.</i>	
Signature: (Authorized Agent)	Date:
Print Name:	Print Title:

Subrecipient Grants Management Assessment (New 7/2017)

The attached form in PDF fillable format is available for download at:
<https://www.caloes.ca.gov/cal-oes-divisions/grants-management/homeland-security-prop-1b-grant-programs/homeland-security-grants-program>

EDMUND G. BROWN JR.
GOVERNOR

MARK S. GHILARDUCCI
DIRECTOR



Cal OES
GOVERNOR'S OFFICE
OF EMERGENCY SERVICES

501(c)(3) Certification

- I certify that my organization is required to apply for and receive recognition of exemption under 501(c)(3) as required by the Internal Revenue Service. Attached is a copy of my organization's 501(c)(3) Determination Letter
- I certify that my organization is not required to apply for and receive recognition of exemption under 501(c)(3) as required by the Internal Revenue Service.

Subrecipient

Print Name and Title of Authorized Agent

Signature of Authorized Agent

Date

3650 SCHRIEVER AVENUE, MATHER, CA 95655
(916) 845-8506 TELEPHONE (916) 845-8511 FAX

The attached form in PDF fillable format is available for download at:
<http://www.caloes.ca.gov/cal-oes-divisions/grants-management/homeland-security-prop-1b-grant-programs/homeland-security-grants-program>

**Federal Funding Accountability and Transparency Act (FFATA)
Financial Disclosure**

Public Law (PL) 109-282 Federal Funding Accountability and Transparency Act of 2006, amended by Section 6202(a) of the Government Funding Transparency Act of 2008 (PL 110-252), which is outlined in FEMA GPD Information Bulletin No. 350.

If the Subrecipient in the preceding year received 80 percent or more of its annual gross revenues in federal Awards; **and** \$25,000,000 or more in annual gross revenues from federal awards, **and** the public does not have access to information about the compensation of the senior executives of the entity, **then the Subrecipient is subject to the FFATA Financial Disclosure requirements, and will need to fill out this form.**

Executive Name	Title	Annual Salary	Annual Dollar Value of Benefits	Total Compensation

Not Subject to FFATA Financial Disclosure

Printed Name and Title

Signature of Authorized Agent

Date

Attachment D – Sample Governing Body Resolution | 2018

BE IT RESOLVED BY THE _____
(Governing Body)
OF THE _____ THAT
(Name of Applicant)
_____, OR
(Name or Title of Authorized Agent)
_____, OR
(Name or Title of Authorized Agent)
_____,
(Name of Title of Authorized Agent)

is hereby authorized to execute for and on behalf of the named Applicant, a public entity established under the laws of the State of California, any actions necessary for the purpose of obtaining federal financial assistance provided by the Federal Department of Homeland Security and subgranted through the State of California for the following Grant Award:

(List Grant Year and Program)

Passed and approved this _____ day of _____, 20 _____

Certification

I, _____, duly appointed and
(Name)

(Title) Of the _____
(Governing Body)

do hereby certify that the above is a true and correct copy of a resolution passed and approved by the

_____ day of _____, 20 _____

(Official Position)

(Signature)

(Date)

Attachment E – FY 2018 NSGP Timeline | 2018

DHS Announcement of FY 2018 NSGP NOFO	May 21, 2018
Cal OES Application due to DHS	June 20, 2018
Subrecipient performance period begins	September 1, 2018
FY 2018 NSGP California Supplement release	September 2018*
Notification of Subrecipient Award Approval letters	45 days from DHS award*
Subrecipient Required Document Workshops	September/October 2018*
Signed Subrecipient Award Approval letters returned to Cal OES	20 days from receipt of Subrecipient Award Approval letter*
Subrecipient Required documents due to Cal OES	Within 45 days of receiving Subrecipient Award Approval letter
Final Cash Advance Request submitted	December 31, 2020
Subrecipient performance period ends	May 31, 2021*
Final Requests for Reimbursement due	Within 20 calendar days of the Grant Subaward expiration date
Cal OES's performance period ends	August 31, 2021

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

Attachment F – FY 2018 NSGP Program Checklist | 2018

Subrecipient: _____ **FIPS#:** _____

Program Representative: _____

Financial Management Forms Workbook:

- _____ Grant Subaward Face Sheet
- _____ Authorized Body of 5 Sheet
- _____ Project Ledger
- _____ Planning Ledger
- _____ Equipment Ledger
- _____ Training Ledger
- _____ Exercise Ledger
- _____ Management and Administration Ledger
- _____ Indirect Cost Ledger
- _____ Consultant-Contractor Ledger
- _____ Personnel Ledger
- _____ Authorized Agent Sheet

Required Documents:

- _____ 501(c)(3) Certification Form
- _____ Environmental Planning and Historic Preservation (EHP) Screening Form
- _____ FFATA Financial Disclosure
- _____ Governing Body Resolution
- _____ Subrecipient Grants Management Assessment form
- _____ STD 204/Payee Data Record
- _____ 2018 NSGP Grant Assurances
- _____ Indirect Cost Rate Agreement (If Applicable)