**Fiscal Year 2022
California State Nonprofit Security Grant
Program (CSNSGP) Guidance**

Table of Contents

Monitoring
Failure to Submit Required Reports
Suspension/Termination
Closeout
Records Retention

ATTACHMENTS

CSNSGP Overview

Funding for the fiscal year (FY) 2022 CSNSGP is allotted by the FY 2022-23 California Budget.

The CSNSGP provides funding support for physical security enhancements and other security-related activities to nonprofit organizations that are at high risk for violent attacks and hate crimes due to ideology, beliefs, or mission.

The CSNSGP seeks to integrate the preparedness activities of nonprofit organizations with broader state and local preparedness efforts and promotes emergency preparedness coordination and collaboration activities between public and private community representatives as well as state and local government agencies.

The period of performance (POP) for the FY 2022 CSNSGP is January 1, 2023, through December 31, 2024. All projects must be completed, and all invoices must be paid by the POP end date.

Purpose of the CSNSGP Guidance

This CSNSGP Guidance (State Guidance) emphasizes California policies and requirements pertaining to the FY 2022 program.

The State Guidance also serves as a reference for Subrecipients in managing their subaward. Subrecipients must comply with all applicable local, state, and federal statutes, regulations, program plans, and application requirements.

Grant Management Memoranda

Cal OES issues [Grant Management Memoranda](#) which provide additional information and requirements regarding state funds.

Supplanting

Supplanting is to deliberately reduce the amount of federal, state, or local funds currently being appropriated to an existing program or activity, because a Grant Subaward has also been awarded for the same purposes.

Grant funds must be used to supplement existing funds, not replace (supplant) funds that have been appropriated for the same purpose. Supplanting is strictly prohibited for all Grant Subaward funds, and will result in the disallowance of the activity associated with this improper use of grant funds.

Sustainability

Program funds are intended to supplement existing resources, and are not guaranteed long term sustainability solutions. Therefore, Subrecipients must be able to sustain projects awarded under the Program without future state grant funding.

Public/Private Organizations

Subrecipients may contract with any other public or private organization to perform eligible activities on approved projects.

Debarred/ Suspended Parties

Subrecipients must not make or permit any award or contract, at any tier, to any party, that is debarred, suspended, or otherwise excluded from, or ineligible for, participation in state assistance programs.

Subrecipients must obtain documentation of eligibility prior to making any contract funded by state funds and must be prepared to present supporting documentation to monitors/auditors.

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 access and functional needs and limited English proficiency in the activities and projects funded by the grant.

Subrecipients should utilize [established best practices for whole community inclusion](#) and engage with stakeholders to advance individual and jurisdictional preparedness and resilience. Subrecipients are encouraged to consider the necessities of all Californians in the activities and projects funded by the grant, including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity, and other underserved populations.

Conflict of Interest

To eliminate and reduce the impact of conflict of interest, Subrecipients must follow their own documented policies and procedures regarding conflict of interest. Subrecipients are also required to follow any applicable federal, state, and local statutes or regulations governing conflict of interest.

California Homeland Security Strategy Goals

The State has prioritized the following California Homeland Security Strategy Goals for the FY 2022 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; and
10. Enhance Homeland Security Exercise, Evaluation, and Training Programs.

State Grants Workbook

The [State Grants Workbook](#) 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 – Provides the contact information of Authorized Agents (AA), delegated via the Governing Body Resolution (GBR) 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 Tab – The Project Ledger Tab is used in the application process to submit funding information, cash requests and Grant Subaward Modifications, and to assist with completion of the required semi-annual Performance Reports.

Equipment Tab – Provides detailed information on grant-funded Equipment.

Operational Tab – Provides detailed information on the following grant-funded activities: Contracted Security, Planning, Training, Construction/Renovation, and Management and Administration (M&A) from consultant/contractors. All training activities must receive Cal OES approval at least 30 days prior to starting the event, including a Training Feedback number. The [Training Request Form](#) may be obtained on the Cal OES website.

Personnel Tab – Provides detailed information on the M&A costs paid to current employees of the Subrecipient.

Authorized Agent Sheet – The AA Page must be submitted with the application, all cash requests, and Grant Subaward Modifications. The AA must include the appropriate name, title, signature, and date.

Subrecipient Grants Management Assessment

Cal OES evaluates the risk of noncompliance with state statutes, regulations, and grant terms and conditions posed by each Subrecipient. The [Subrecipient Grants Management Assessment](#) contains questions related to an organization's experience in the management of state Grant Subawards. It is used to determine and provide an appropriate level of technical assistance, training, and grant oversight to Subrecipients. The questionnaire must be completed and returned with the grant application.

Application Attachments

501(c)(3) Certification Form – Use the [501(c)(3) Certification Form](#) to certify and acknowledge if a 501(c)(3) Determination Letter is required by the Internal Revenue Service.

STD 204 Payee Data Record – A form used to assign an organization a Federal Information Processing Standard number. This form is to be submitted as soon as possible to the Program Representative for verification.

Filing Requirements – Subrecipients must comply with various filing requirements put forth by the State of California:

- California Department of Justice (DOJ) (if applicable)
- U.S. Internal Revenue Service (IRS) Federal Employer Identification Number (FEIN)
- California Franchise Tax Board (FTB) (if applicable)
- California Secretary of State (SOS)

Subrecipients must verify that the name and address listed on the STD 204 are consistent with how the organization is registered with the FTB, DOJ, SOS, and IRS. It is the Subrecipient's responsibility to ensure that the name and address are consistent between the STD 204, FTB, DOJ, SOS, and IRS. All changes to the organization name and address must be provided to Cal OES in writing and must include an updated STD 204.

Environmental Standards

Subrecipients must comply with state environmental standards, including:

- California Environmental Quality Act (CEQA) (California Public Resources Code §§ 21000 - 21177), to include coordination with the city or county planning agency; and
- CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§ 15000 - 15387).

CEQA may require the preparation of an environmental document by the Subrecipient prior to commencing the project or program. Subrecipients should contact their legal counsel and/or the department or agency within their jurisdiction responsible for CEQA compliance for further information about the applicability of CEQA to their project. Subrecipients are responsible for maintaining all environmental documents and must be made available for review by Cal OES staff upon request.

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, FY 2022 State Grant Program Standard Assurances document as part of their FY 2022 CSNSGP 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 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 GBR with their application.

The Certification Section on the GBR must be filled in and signed by someone other than the person(s) listed as AAs at the top of the GBR.

Authorized Agent Information

For each person or position appointed by the Governing Body, identify the individual in the **AA Info** tab of the State Grants Workbook.

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 GBR is required 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.

Required Documents Submission	Subrecipients must submit an electronic copy of their completed State Grants Workbook (Workbook) to their Program Representative for review. After the required documents are approved, all electronic copies of the Workbook, along with the required documents must be emailed to the Program Representative, with original signatures, by the application due date. During the application process, if it is determined all allocated funds cannot be expended by the end of the POP, inform the Program Representative as soon as possible. The completed application documents should be received by Cal OES no later than the date provided in the FY 2022 CSNSGP Timeline, referenced as Attachment A.
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 emailed to the Program Representative prior to the due date. Cal OES has sole discretion to accept or reject late or incomplete required documents.
Contact Information	All Subrecipient required documents, questions, comments, and correspondence should be directed to their Program Representative:

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

Scott Sano, Unit Chief	Scott.Sano@CalOES.ca.gov
Matthew Brown	Matthew.Brown@CalOES.ca.gov
Gabrielle Ferrari	Gabrielle.Ferrari@CalOES.ca.gov
Thu Le	Thu.Le@CalOES.ca.gov
David Nguyen	David.Nguyen@CalOES.ca.gov
Leslie Tagtmeier	Leslie.Tagtmeier@CalOES.ca.gov

Subaward Approval	Subrecipients will receive a formal notification of award. Subrecipient award letters must be signed, dated, and returned to Cal OES within 20 calendar days. Once the completed application and the final award letter is received and approved, reimbursement of eligible award expenditures may be requested using the Workbook.

Scope of Work   Subrecipients must obtain Cal OES prior approval on all changes to the original scope of their subaward before incurring expenditures or requesting cash drawdowns under a modified project.

Modifications   Post subaward budget, scope, or time modifications must be requested using the most current Workbook, signed by the Subrecipient's AA, and submitted to the Program Representative.

Request for change in scope or objective of the grant-funded activity after the award is made must be submitted to Cal OES. Modifications may be approved only if the requested item(s) are listed on the Subrecipient's CSNSGP Application, and are subject to the policy of this grant program. Subrecipients must also complete the Cal OES Modification Request Form. The request must include the following:

- A written request from the Subrecipient on its letterhead, outlining the scope or objective change, including the approved projects from the Subrecipient's application, the funds and relative scope or objective significance allocated to those projects, the proposed changes, and any resulting reallocations as a result of the change of scope or objective;
- An explanation of why the change of scope or objective is necessary; and
- The Subrecipient must also address whether the proposed changes will impact its ability to complete the project within the award's POP.

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

Extension Requests   Subrecipients are expected to complete all grant-funded activity by the end of the POP. Any costs incurred outside of the POP will be unallowable under the Grant Subaward.

Extensions to the initial POP 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:

Extension Requests Cont.

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 only be granted for 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 POP;
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 sixty days prior to the end of the Subrecipient's POP 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 the delay;
3. Current status of the activity(ies);
4. Approved performance period termination date and new project completion date;
5. Amount of funds drawn down to date;
6. Remaining available state funds;
7. Budget outlining how remaining state 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(ies) will be completed within the extended POP without any modification to the

original Statement of Work.

Extension Requests Cont.	General questions regarding extension requirements and the extension request form should be directed to your Program Representative.
Payment Request Process	Reimbursements are the primary and preferred method of payment for Cal OES. To request payment of funds, Subrecipients must submit the Workbook, Invoices, and Proof of Payment to their assigned 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 and have received the final letter.
Procurement Procedures	A minimum of three quotes for purchases of $10,000 or more are required, unless a lower or more restrictive threshold is established in the organization's procedures. Please retain all of these quotes for your records and if needed, provide them to your Program Representative.
Semi-Annual Drawdown Requirements	All Subrecipients must report expenditures and request funds at least semi-annually throughout the POP. Semi-annual drawdowns should occur in June and December 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 subaward POP.
Contract and Procurement Requirements	Subrecipients must follow the State Contracting Manual (SCM), to procure goods and services with state funds. The SCM provides policies, procedures, and guidelines for the state contracting process.
Construction or Renovation	Construction or Renovation is allowed under this Program. Construction or Renovation activities should be done in support of the target hardening activities and is limited to 15 percent of the total Grant Subaward. (Equipment installation is not considered Construction or Renovation). All Construction or Renovation activities must comply with applicable federal, state, and local laws and regulations.

Cash Advances and Interest Earned on Advances

Advance payment means that a payment is requested before Subrecipients have disbursed funds for program purposes. Subrecipients may be paid an advance, provided they use documented procedures to minimize the time elapsing between the receipt of subaward funds and their disbursement.

Requests for advance of funds cannot exceed 25 percent of the total Grant Subaward, and must be used pursuant to the intent of the approved advance. The timing and amount of advance payments must be as close as administratively feasible to the actual disbursements by the Subrecipient for project costs.

If a Subrecipient chooses to place advance subaward funds in an interest bearing account, then any interest accrued must be used for the same approved eligible activities as the grant program allocations.

An advance must be closed out before subsequent funding is requested. To close out the advance, Subrecipients must submit the supporting documents to their Program Representative and any equipment purchased with advanced funds must be installed before subsequent funding is requested.

Contracted Security Personnel

Contracted security personnel is allowed under this Program. The Subrecipient must be able to sustain this capability in future years without the CSNSGP funding. CSNSGP funds may not be used to purchase equipment for contracted security. Virtual monitoring or professional 24/7 monitoring by security system companies are not considered contracted security personnel. Funding for contracted security cannot exceed 50 percent of the total Grant Subaward.

Equipment

Allowable costs are focused on target hardening and physical security enhancements. Funding can be used for the acquisition and installation of security equipment on real property (including buildings and improvements) owned or leased by the nonprofit organization, specifically in the prevention of and/or protection against the risk of a terrorist attack. Please note that the equipment projects proposed in the original application may require adjustments in order to be in alignment with the policies of the CSNSGP.

Equipment Cont.

Examples of equipment allowable under this Program include:

- Physical security enhancement equipment, including, but not limited to reinforced doors and gates, and high-intensity lighting and alarms;
- Inspection and screening systems, and access control; and
- Any other security enhancement consistent with the purpose of the CSNSGP

Equipment Identification and Records/ Disposition

Subrecipients must maintain a readily identifiable inventory of all equipment purchased in whole, or in part, with Grant Subaward funds.

Equipment records must contain the following information:

- A description of the property;
- Serial number, or other identification number;
- Identification of the title holder;
- Acquisition date;
- Cost of the equipment;
- Percentage of cost supported with Grant Subaward funds;
- Location of the equipment;
- Use and condition of the equipment; and
- Disposition data, including date of disposal or price of sale.

A physical inventory of equipment shall be performed, and the results reconciled with the equipment records at least once every two years. Subrecipients are responsible for maintaining all equipment purchased with Grant Subaward funds and all the equipment must be available for review by Cal OES staff.

Management and Administration

The Management and Administration (M&A) allowance for Subrecipients is set at a maximum of five percent of their subaward amount. This consists of paying full-time or part-time contractors/consultants, or employees to perform M&A duties of the Grant Subaward. Examples of M&A include preparing and submitting required programmatic and financial reporting, maintaining equipment inventory, documenting expenditures for financial purposes, and responding to requests for programmatic and financial data.

Management and Administration Cont.

Project Management tasks are not considered M&A and are not an allowable cost under the CSNSGP. Activities such as contacting vendors, reviewing bids, selecting vendors, and overseeing vendor work are not considered M&A.

Planning

Subaward funding may be used for security or emergency planning expenses and the materials required to conduct the planning activities. Planning must be related to the protection of the facility and the people within its immediate vicinity, 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; and
- Evacuation/Shelter-in place plans

Training

Allowable training-related costs under the CSNSGP are limited to:

- Attendance fees for the training; and
- Related expenses such as materials, supplies, and or equipment for the training.

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 application and must be presented by a pre-approved training provider. All grant-funded training activities must receive Cal OES approval at least 30 days prior to starting the training event via a [feedback number](#) from the Training Branch at Cal OES.

Unallowable Costs

Funds may not be used for the following:

- Purchase of equipment, tools, or personal protective equipment for contracted security personnel;
- Weapons, weapon parts and accessories, and ammunition; and
- Travel costs; and permanent Personnel Costs.

Performance Reporting

Subrecipients must complete semi-annual performance reporting for the duration of the subaward POP or until all grant activities are completed and the subaward is formally closed by Cal OES. Failure to submit the required performance reporting could result in a subaward reduction, suspension, or termination.

The [Performance Report Template](#) can be found on the Cal OES website. Project numbers listed on Performance Reports should mirror the Workbook Project Ledger.

All Subrecipients who receive Cal OES approval to extend their FY 2022 Grant Subaward POP will be required to submit Performance Reports indicating completed and future project milestones on all extended projects. Performance Reports must be submitted to the Program Representative.

Deadlines for the submission of Performance 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 that Subrecipients are in compliance with applicable state regulations, grant guidelines, and programmatic requirements. Monitoring activities may include, but are not limited to:

- Verifying that entries recorded on the Workbook categories are properly supported with source documentation;
- Eligibility of and support for expenditures, typically covering two to three years of data;

Monitoring Cont.

- Comparing actual Subrecipient activities to those approved in the grant application and subsequent modifications, including the review of functional timesheets and invoices as applicable;
- Procurements and contracts;
- Ensuring equipment inventory lists are properly maintained and physical inventories are conducted;
- Ensuring advances have been disbursed in accordance with applicable guidelines; and
- Confirming compliance with:
  o Standard Assurances, and
  o Information provided on performance reports and payment request.

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 subawards reduced by 10 percent until timely reporting is re-established.

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 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;
- Proposing or implementing substantial plan changes to the extent that, if originally submitted, the application would not have been selected for funding; and
- False certification in the application or any subaward-related document.

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 subawards when it determines all applicable administrative actions and all required work of the subaward 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; and
- Reconciling actual costs to awards, modification, and payments;

Records Retention

The records retention period is three years from the date of the Cal OES Grant Closeout letter, 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.

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.

FY 2022 CSNSGP Request for Proposal Released	August 30, 2022
Subrecipient POP begins	January 1, 2023
Notification of Subrecipient Subaward	February 8, 2023
FY 2022 CSNSGP Guidance release	March 2023
Subrecipient Required Document Workshops and Webinars	March 2023
Subrecipient Required Documents due to Cal OES	May 19, 2023
Semi-annual Performance Report for January 1, 2023 – June 30, 2023 due	July 14, 2023
Semi-annual Performance Report for July 1, 2023 – December 31, 2023	January 15, 2024
Semi-annual Performance Report for January 1, 2024 – June 30, 2024 due	July 14, 2024
Subrecipient POP ends	December 31, 2024
Final Semi-annual Performance Report for July 1, 2024 – December 31, 2024 due	January 14, 2025
Final Requests for Reimbursement submitted	Within 20 calendar days of Subrecipient POP end date.

Subrecipient: _____   **Cal OES ID#:** _____

Program Representative: _____

State Grants Workbook:

_____	Grant Subaward Face Sheet
_____	Authorized Agent Contact Information
_____	Project Ledger Tab
_____	Equipment Tab
_____	Operational Tab
_____	Personnel Tab
_____	Authorized Agent Sheet

Required Documents:

_____	Original Counter-signed Subrecipient Award Letter
_____	Governing Body Resolution
_____	Standard Assurances
_____	501(c)(3) Certification Form
_____	Subrecipient Grants Management Assessment
_____	STD 204/Payee Data Record