



***Cal* OES**

**GOVERNOR'S OFFICE  
OF EMERGENCY SERVICES**

**Fiscal Year 2024  
California State Nonprofit Security Grant  
Program (CSNSGP) Guidance**

**SECTION 1 – Overview and State Initiatives ..... 1**

- Purpose of the CSNSGP Guidance
- CSNSGP Overview
- Key Changes to the FY 2024 CSNSGP
- Grant Management Memoranda
- Eligible Subrecipients
- Supplanting
- Sustainability
- Public/Private Organizations
- Debarred/Suspended Parties
- Whole Community Preparedness
- Conflict of Interest
- California Homeland Security Strategy Goals

**SECTION 2 – Required State Application Components..... 5**

- Grant Subaward Application
- Subrecipient Grants Management Assessment
- Application Forms
- Environmental Standards
- Standard Assurances
- Program Standard Assurances Addendum
- Governing Body Resolution
- Authorized Agent Information

**SECTION 3 – State Application Process..... 8**

- Application Submission
- Late or Incomplete Required Documents
- Contact Information
- Subaward Approval

**SECTION 4 – Post Subaward Requirements..... 9**

- Scope of Work
- Modifications
- Extension Requests
- Payment Request Process
- Semi-Annual Drawdown Requirement
- Procurement Standards and Written Procedures
- Procurement Documentation
- Procurement Thresholds
- Noncompetitive Procurement
- Competition
- Vendor Licensing
- Bids, Estimates, and Invoices
- Construction or Renovation

Contracted Security Personnel  
Equipment  
Equipment Identification and Records/Disposition  
Management and Administration  
Planning  
Training  
Support Services  
Unallowable Costs  
Performance Reporting  
Monitoring  
Failure to Submit Required Reports  
Suspension/Termination  
Closeout  
Records Retention

**ATTACHMENT**

A – FY 2024 CSNSGP Timeline

### **Purpose of the CSNSGP Guidance**

The CSNSGP Guidance (State Guidance) emphasizes California policies and requirements pertaining to the FY 2024 program.

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

### **CSNSGP Overview**

Funding for the Fiscal Year (FY) 2024 CSNSGP is allotted by the FY 2024-25 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 2024 CSNSGP is December 1, 2024, through December 31, 2026. All projects must be completed, and all invoices must be paid by the POP end date.

### **Key Changes to the FY 2024 CSNSGP**

#### **Support Services**

Applicants that receive a Grant Subaward may use and expend up to five percent of their funds for Support Services activities. This cost consists of providing support services to another nonprofit organization or a cluster of other nonprofit organizations for the following:

- Vulnerability Assessments;
- Security trainings;
- Mass notification alert systems;
- Monitoring and response systems; or
- Lifesaving emergency equipment

**Key Changes to the FY 2024 CSNSGP Cont.**

**Grants Central System (GCS)**

GCS will simplify the grant process with a streamlined, efficient, and automated approach to manage grant programs.

Starting with the FY 2024 grant application cycle, Subrecipients will complete and submit their Grant Subaward applications, and all related grant activities throughout the grant cycle in GCS. All previous open grant year activities will continue with the Workbook.

**Grant Management Memoranda**

Cal OES issues Grant Management Memoranda, which provide additional information and requirements regarding state funds.

**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 (IRC) and exempt from tax under Section 501(a) of such code.

**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 organizations 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.

**Debarred/  
Suspended  
Parties Cont.**

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.

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 Grant 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.

**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 2024 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.

### **Grant Subaward Application**

Subrecipients must complete and submit their Grant Subaward Application through GCS. All forms and required fields must be completed in order to submit the application in the GCS.

Cal OES may require revisions and/or additional documentation to finalize the Grant Subaward Application submission in GCS. The assigned Grants Analyst will provide guidance on completing the application.

### **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 during the subaward. The Subrecipient Grants Management Assessment Form must be completed as part of the application in GCS.

### **Application Forms**

**IRS Determination Letter** – The IRS determination letter notifies a nonprofit organization that its application for federal tax exemption under Section 501(c)(3) has been approved. This letter must be submitted as part of the Organization entry process in GCS.

**STD 204 Payee Data Record** – A form used to assign an organization a Federal Information Processing Standard number. This form must be submitted as part of the application in GCS.

**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)

**Application Forms Cont.**

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. The FY 2024 Standard Assurances must be completed as part of the application in GCS.

**Program Standard Assurances Addendum**

The Program Standard Assurances Addendum specifies additional requirements that Subrecipients must meet. The Program Standard Assurances Addendum must be completed as part of the application in GCS.

### **Governing Body Resolution (GBR)**

The GBR appoints Official Authorized Agents (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 Grant Subaward. An approved GBR must be submitted as part of the application in GCS.

The *Certification* Section of the GBR must be completed and signed by someone other than the person(s) listed as AA at the top of the GBR.

### **Authorized Agent Information**

For each person or position appointed by the Governing Body, identify the individual(s) in GCS by assigning them the AA role. More than one person is recommended for designation as the AA.

All changes in AA and contact information must be submitted through GCS. 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 an existing AA, who can register the new AA in the GCS. Cal OES will not accept signatures of an AA's designee, unless authorized by the governing body's resolution. A change to an AA's designee must be submitted through the GCS.

**Application Submission**

Subrecipients must complete and submit their Grant Subaward Application through GCS. All forms and required fields must be completed in order to submit the application in GCS. During the application process, if it is determined not all allocated funds can be expended by the end of the POP, please inform your Grants Analyst as soon as possible. The completed application should be submitted in the GCS no later than the date provided in GCS, and the FY 2024 CSNSGP Timeline, referenced as Attachment A.

**Late or Incomplete Required Documents**

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

**Contact Information**

Subrecipients should direct any Grant Subaward application questions and comments to their Grants Analyst in GCS, or [CSNSGP@caloes.ca.gov](mailto:CSNSGP@caloes.ca.gov)

**Subaward Approval**

Subrecipients will receive a notification of Grant Subaward approval in GCS. Once the completed application is approved, reimbursement of eligible Grant Subaward Report of Expenditures and Payments may be requested in GCS.

### **Scope of Work**

Subrecipients must obtain Cal OES prior approval on all changes to the original scope of their Grant Subaward before incurring expenses or requesting a Report of Expenditures and Payment under a modified project.

### **Modifications**

Grant Subaward budget, scope, or time modifications must be requested through GCS. The Subrecipient may implement grant modification activities, and incur associated expenses, only after receiving approval of the modification request through GCS.

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.

### **Extension Requests**

Subrecipients are expected to complete all grant-funded activity by the end of the POP. Any expenses 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 Grants Analyst. 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.

<b>Extension Requests Cont.</b>	General questions regarding extension requirements and the extension request form should be directed to your Grants Analyst.
<b>Payment Request Process</b>	<p>The CSNSGP is a reimbursement program. To request payment of CSNSGP funds, Subrecipients must complete a Report of Expenditures and Payment Request in GCS, and include applicable bids, invoices, and Proof of Payment.</p> <p>Payments can only be made if the Subrecipient has an executed Grant Subaward.</p>
<b>Semi-Annual Drawdown Requirements</b>	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 the execution of the Grant Subaward, with the exception of the final Report of Expenditures and Payment Request, which must be submitted within 60 calendar days after the end of the subaward POP. If the Grant Subaward includes a Special Condition to reduce the liquidation period, the Special Condition supersedes this section.
<b>Procurement Standards and Written Procedures</b>	Subrecipients are required to conduct procurement activities with documented procurement procedures that align with federal procurement standards outlined in 2 C.F.R. Part 200. In cases where there is a conflict between the local procedures and federal standards, the more stringent requirements must be followed. Additionally, subrecipients must implement written conflict of interest policies that govern the actions of employees involved in the selection, award, and administration of contracts. These policies should include provisions for disciplinary actions in the event of violations.
<b>Procurement Documentation</b>	<p>Subrecipients must maintain records that document the procurement process, including the rationale for the procurement method, contract type, contractor selection or rejection, and the basis for the contract price. To be allowable, costs must be properly documented. Acceptable documentation includes, but is not limited to:</p> <ul style="list-style-type: none"><li>• Solicitation documentation, such as requests for quotes, invitations for bids, or requests for proposals;</li></ul>

### Procurement Documentation Cont.

- Responses to solicitations, such as quotes, bids, or proposals;
- Pre-solicitation independent cost estimates and Post-solicitation cost/price analyses on file for review by federal personnel, if applicable;
- Contract documents and amendments;
- Documents demonstrating inclusion of required contract provisions, and
- Other documents required by federal regulations applicable at the time the grant was awarded to the Subrecipient.

### Procurement Threshold

Under 2 C.F.R. Part 200, procurement thresholds are defined as follows:

- **Micro-purchase threshold:** This is the maximum amount for which purchases can be made without requiring competitive quotes or formal procurement processes, provided the price is reasonable. The micro-purchase threshold is set at **\$10,000**.
- **Simplified acquisition threshold:** This sets the maximum amount for which federal procurement procedures may be simplified. The threshold is **\$250,000**. For purchases at or below this amount, subrecipients may use streamlined methods, such as obtaining competitive price or rate quotations from an adequate number of qualified sources. Purchases exceeding \$250,000 require more formal procurement procedures, including sealed bids or competitive proposals.

Subrecipients must adhere to these thresholds and, in cases of conflict between local procurement procedures and federal requirements, must apply the more stringent threshold.

### Noncompetitive Procurement

All noncompetitive procurements exceeding the simplified acquisition threshold require Cal OES **prior** written approval to be eligible for reimbursement. This method of procurement must be approved by the local Purchasing Agent prior to submitting a request for Cal OES approval. A copy of the Purchasing Agent's approval must be included with the Cal OES [Request for Noncompetitive Procurement Authorization form](#). Cal OES may request additional documentation that supports the procurement effort.

### **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 and § 200.320.

Follow the federal or your own written procurement policies, whichever is more restrictive. If you follow your policies, they must meet the following minimum requirements:

- Obtain multiple written (signed and dated) bids from vendors; and
- 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 CSLB website or by calling (800) 321-2752. 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 costs should be listed separately and detailed including price per hour per person; and
- State/local taxes should be listed separately.

### **Bids, Estimates, and Invoices Cont.**

Bids/Invoices must be issued by the vendor who installed the equipment or performed the service. Bids/Invoices may not be created by the Subrecipient or Representatives of the Subrecipient.

### **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 \$100,000 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.

### **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 fifty 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.

Examples of equipment allowable under the Program include:

- Physical security enhancement equipment, including, but not limited to reinforced doors and gate, 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  
(M&A)**

The M&A allowance for Subrecipients is set at a maximum of five percent of the Grant 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. 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

Grant 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 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.

### Support Services

Subrecipients may use and expend up to five percent of their Grant Subaward for Support Services activities. This cost consists of providing support services to another nonprofit organization or a cluster of other nonprofit organizations for the following:

- Vulnerability Assessments
- Security Trainings
- Mass Notification Alert Systems
- Monitoring and Response Systems
- Lifesaving Emergency Equipment

### **Unallowable Costs**

Grant Subawards 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;
- Travel costs and permanent Personnel Costs.
- Hiring of Public Safety Personnel (ex: Police Officer, Firefighter, and EMTs);
- General-Use Expenditures;
- Travel expenses;
- Organizational operating expenses, overtime, and backfill;
- Initiatives that are unrelated to prevention and protection-focused capabilities directed at identified facilities and/or the surrounding communities;
- Initiatives in which government agencies are the beneficiary;
- Any expenses incurred on your projects outside of the Grant Subaward POP.

### **Performance Reporting**

Subrecipients must submit semi-annual Performance Reports for the duration of the Grant 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. All Subrecipients who receive Cal OES approval to extend their FY 2024 Grant Subaward POP will be required to submit Performance Reports indicating completed and future project milestones on all extended projects.

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 Subrecipients are in compliance with applicable state regulations, grant guidelines, and programmatic requirements. Monitoring activities may include, but are not limited to:

- Verifying entries recorded in the GCS 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 Subaward 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:
  - Standard Assurances, and
  - Information provided on performance reports and payment request.

### **Failure to Submit Required Reports**

Periodic reporting is required by the Grant Subaward. 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 ten 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;

### **Suspension/ Termination Cont.**

- 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 Subrecipient Grant Subawards when it determines all applicable administrative actions and all required work of the subaward have been completed.

Grant Subawards will be closed after:

- Grant Subaward POP and the applicable liquidation period have ended;
- 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. Any remaining balance will be disencumbered automatically (part of the closeout process); and
- Reconciliation of actual costs to subaward, modifications, reimbursements, or advance have been completed.

### **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 will notify the Subrecipient of the start of the records retention period for all programmatic and financial grant-related records.

**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.

## Attachment A – FY 2024 CSNSGP Checklist | 2024

FY 2024 CSNSGP Request for Proposal Released	July 30, 2024
Subrecipient POP begins	December 1, 2024
Notification of Subrecipient Grant Subaward	March 19, 2025
Application Webinars	April /May 2025
FY 2024 CSNSGP Guidance release	June 2025
Subrecipient Application due to Cal OES	July 31, 2025
Semi-annual Performance Report for January 1, 2025 – June 30, 2025	July 14, 2025
Semi-annual Performance Report for July 1, 2025 – December 31, 2025	January 14, 2026
Semi-annual Performance Report for January 1, 2026 – June 30, 2026	July 14, 2026
Subrecipient POP ends	December 31, 2026
Final Semi-annual Performance Report for July 1, 2026 – December 31, 2026	January 14, 2027
Final Requests for Reimbursement submitted	Within 20 calendar days of Subrecipient POP end date.