



FY 2021 Nonprofit Security Grant Program Required Documents Webinar

Cal OES Infrastructure Protection Grant Unit Please Mute Your Audio For The Presentation





- Infrastructure Protection Grants Unit Overview
- Required Documents
- Preparedness Grants Manual
- Allowable vs Unallowable
- The Workbook
- Payment Process and Modification
- Procurement Requirements
- Accountability Requirements
- Resources
- Closing



The Infrastructure Protection Grant Unit is responsible for the overall grant management of the Nonprofit Security Grant Program (NSGP).

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Award Letters



Award letters are issued for each of two phases in the application process.

Phase I: NOTIFICATION OF SUBRECIPIENT AWARD APPROVAL

- Funding Amount
- Grant ID Number
- Expenditure Period
- Additional Application Requirements
- Reporting Requirements
- Hold Information and Hold Amount
- Cal OES Contact Information
- The Authorized Agent must sign the bottom of the letter and make a copy for organization's grant binder. The signed letter must be returned to Cal OES within <u>twenty calendar days</u> of the date of the letter.

Phase II: NOTIFICATION OF APPLICATION APPROVAL

- Issued when all application requirements are complete.
- Environmental Historic Preservation Screening Form (EHP) must be approved before you can be advanced funds or receive a reimbursement. No equipment may be purchased or installed prior to the date of the EHP approval.

Required Documents



- 1. Payee Data Record (STD 204)
- 2. 501(c)(3) Certification
- 3. Federal Funding Accountability and Transparency Act (FFATA) Financial Disclosure
- 4. Governing Body Resolution
- 5. Grant Assurances
- 6. Subrecipient Grant Management Assessment Form
- 7. Certification Regarding Lobbying
- 8. Environmental Planning and Historic Preservation (EHP) Screening Form
- 9. Financial Management Forms Workbook (FMFW)

All of the required application documents must be received and approved by Cal OES before you will be able to request an advance or reimbursement of funds.

Please submit All Required Documents via email to your Program Representative By November 17, 2021.

All required documents MUST be validated with Program Representative approval no later than December 1, 2021.

1) Payee Data Record/STD 204



- Required when receiving payment from the State of California in lieu of IRS W-9.
- Available for download <u>Here</u>
- Required for all non-governmental entities and will be kept and filed within Cal OES.
- Section 6 information:

Cal OES Infrastructure Protection Grants Unit 3650 Schriever Avenue Mather, CA 95655



(The <u>Correct Name</u> as stated on the FEIN or 501c3 letter must be listed exactly on each Required Document that is submitted to Cal OES.)

- Subrecipients must verify that the name and address listed on the STD 204 is consistent with how the organization is registered with the Franchise Tax Board (FTB), Department of Justice (DOJ), Secretary of State (SOS), Internal Revenue Service's Federal Employer Identification Number (FEIN), and Dun and Bradstreet Number (if registered).
- It is the Subrecipient's responsibility to ensure that the name and address are consistent between the STD 204, FTB, DOJ, and SOS.
- All changes to an organization's name and/or address must be provided to Cal OES in writing and must include an updated STD 204.



The <u>**Correct Name**</u> must be listed exactly on each Required Document that is submitted to Cal OES and match the organization's record with:

- IRS: Organizations will be looked up by their Employer Identification number and the record checked to ensure that the information matches submitted name and address exactly. To check on your organization, please visit:
 - <u>https://apps.irs.gov/app/eos/</u>
- California Secretary of State: Organizations will be looked up and the record checked to ensure that the information matches submitted information exactly. To check on your organization, please visit:
 - <u>https://businesssearch.sos.ca.gov/</u>
- Dun and Bradstreet: Organizations will be looked up and the record checked to ensure that the information matches submitted information exactly. To check on your organization, please visit:
 - <u>https://www.dnb.com/duns-number/lookup.html</u>

1) Payee Data Record/STD 204



The <u>**Correct Name**</u> must be listed exactly on each Required Document that is submitted to Cal OES and match the organization's record with:

- Franchise Tax Board: Organizations will be looked up and any records found checked to ensure that the information matches submitted name and address exactly. To check on your organization, please visit:
 - <u>https://webapp.ftb.ca.gov/eletter/?Submit=Check+Status</u>
- California Department of Justice: Organizations will be looked up and any records found checked to ensure that the information matches submitted name and address exactly. To check on your organization, please visit:
 - <u>http://rct.doj.ca.gov/Verification/Web/Search.aspx?facility=Y</u>

1) Payee Data Record/STD 204

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	Payee Information		
NAME (This Mequired. Do not leave this line blank. Must match the pa BUSINESS NAME, DBA NAME or DISREGARDED SINGLE ME		f different from above)	
MAILING ADDRESS (number, street, apt. or suite no.) (See instruction	ons on Page 2)		
CITY, STATE, ZIP CODE	E-MAIL	ADDRESS	
Section 2 Check one (1) box only that matches the entity type of the Pa	2 – Entity Type	1 above (See instructions	on page 2)
 SOLE PROPRIETOR / INDIVIDUAL SINGLE MEMBER LLC Disregarded Entity owned by an individual PARTNERSHIP ESTATE OR TRUST 	CORPORATION (see	e instructions on page 2) entistry, chiropractic, etc.) ney services)	
Section 3 – Tax	Identification Num	ber	
Enter your Tax Identification Number (TIN) in the appropriate box match the name given in Section 1 of this form. Do not provide r The TIN is a 9-digit number. Note: Payment will not be processe • For Individuals, enter SSN.	more than one (1) TIN.	Social Security Numbe Individual Tax Identifica	
 If you are a Resident Alien, and you do not have and are no SSN, enter your ITIN. 	ot eligible to get an	****	
 Grantor Trusts (such as a Revocable Living Trust while the g not have a separate FEIN. Those trusts must enter the indiv For Sole Proprietor or Single Member LLC (disregarded et al. 1996) 	idual grantor's SSN.	OR Federal Employer Identi	ification Number
sole member is an individual, enter SSN (ITIN if applicable prefers SSN).	e) or FEIN (FTB	(FEIN)	
 For Single Member LLC (disregarded entity), in which the business entity, enter the owner entity's FEIN. Do not use 			

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2) 501(c)(3) Certification



The 501(c)(3) Certification form requests Subrecipients to certify and acknowledge if they are required by the Internal Revenue Service to have a 501(c)(3) Determination Letter. Religious organizations should mark the 2nd paragraph box, because they do not need a 501(c)(3) Determination Letter.



3) FFATA Financial Disclosure



As defined by the Office of Management and Budget, the following are subject to FFATA reporting requirements:

 All new federal awards of \$30,000 or more as of August 13, 2020.
 NOTE: Cal OES reports on this requirement in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS).

 The Total Compensation and Names of the top five executive, if the Subrecipient in the preceding year received:

 a. 80 percent or more of its annual gross revenues in Federal Awards; and
 b. \$25,000,000 or more in annual gross revenues from

Federal awards; and

c. The public does not have access to information about the compensation of the senior executives of the entity.



This is an official document, originating from the subrecipient, declaring the nonprofit organization's intention to accept the award and abide by the terms of the grant.

Document Requirements:

- A header that clearly displays the name of the nonprofit organization.
- The names of the governing body board members.
- The name(s) of the authorized agent(s) who will represent the nonprofit organization for all official transactions and requests.

Note: The Authorized Agent(s) indicated on this form cannot vote or appoint themselves, and whomever is appointed cannot certify the vote or Sign the Governing Body Resolution.

4) Governing Body Resolution

BE IT RESOLVED	BY THE		
		(Governing	
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		pplicant)	, OR
	(Name or Title	of Authorized	d Agent)
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	(Name of Title	of Authorized	A Agent)
	(Name or Thie)	or Authorized	u Ayeni)
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The Standard Assurances list the requirements to which the Subrecipients will be held accountable. All Applicants will be required to submit a signed copy of the FY 2021 Standard Assurances as part of their FY 2021 NSGP application.

NOTE: Self-created Standard Assurances will not be accepted. No changes or alterations to this document are allowed. This is non-negotiable.

Policies may be developed during the course of the grant performance period. Subrecipients will be notified of these changes via Grant Management Memoranda (GMM), and phone or email messages from Cal OES program staff.

6) Subrecipient Grants Management Assessment



- Cal OES is required under <u>2 CFR § 200.331</u> to evaluate the risk of noncompliance with federal statutes, regulations, and grant terms and conditions posed by each subrecipient of pass-through funding.
- Form is used to determine the appropriate level of technical assistance required from each subrecipient.
- Questions are based on experience in bookkeeping, accounting, grant complexity, years of on-the-job training/experience, and audit/review preparedness.
- Must be signed by Authorized Agent

6) Subrecipient Grants Management Assessment



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

Sere prent:			DUNS #:			FIPS #:		
ant Disaster/Progr	am Title:							
Performance Period:	to		Subawar	d Amou	int Reque	sted:		
Type of Non-Federal	Entity (Check Box)	State Gov.	Loca	l Gov.	JPA		on-Profit	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 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, or the governmental implementing agency, as applicable.

	Assessment Factors	Response	
1.	How many years of experience does your current grant manager have managing grants?	Select	•
2.	How many years of experience does your current bookkeeper/accounting staff have managing grants?	Select	•
3.	How many grants does your organization currently receive?	Select	•
4.	What is the approximate total dollar amount of all grants your organization receive?		
5.	Are individual staff members assigned to work on multiple grants?	Select	•



Use the <u>Certification Regarding Lobbying form</u> to certify lobbying activities, as stipulated by the Byrd Anti-Lobbying Amendment, 31 U.S.C. § 1352.31 & U.S.C. § 1352.

Purpose: Used to certify the organization will not use federal grant funding for the purpose of lobbying for additional federal benefit.

If the organization does engage in the practice of lobbying with its own funds (non federally appropriated) the organization will fill out, in addition to, the <u>Standard Form-LLL</u>, 'Disclosure of Lobbying Activities.'

8) Environmental Planning and Historic Preservation (EHP) Screening Form



The EHP screening is carried out with the primary purpose of preservation of historical and archeological sites.

The EHP requires a detailed project description that explains the objectives of the proposed project, along with supporting documentation.

FEMA's Grant Programs Directorate's (GPD) EHP uses this information to determine whether the proposed project has the potential to affect the environmental and/or historic properties.

Required Documents:

- 1. EHP Screening Form (FEMA Form 024-0-1)
- 2. Photographs with labels and narrative of proposed equipment installations in an attached PDF.



Section A – Project Information:

- Provide a description of your project that includes specific details about equipment, location, installation, and/or activities involved.
- For training exercises, provide the date the training is scheduled.
- Providing complete detailed information will help avoid delays.

Example of Descriptions

Bad	Good
Install cameras in courthouse	Install 4 video cameras on first floor of 1898 county courthouse. Cameras will be installed opposite exit doors, 2 feet below drop ceiling (see diagram for location, position, and height). Wiring will use existing conduits etc.



Section B – Project Type:

- Select the boxes which describes the project type.
- The selected boxes show the parts of Section C to be completed.

For NSGP subrecipients you will select Project Types 1 and 3, and possibly 2 if it applies.

- 1. Purchase of Equipment
- 2. Training and Exercises
- 3. Renovations/Upgrades/Modifications or Physical Security Enhancements to Existing Structures



Section C – Project Type Details:

- Go to the sections per the selected boxes from Section B.
- Read and complete each bulleted question.
- Note the sections that require Section D to be completed as well.

Section D – Project Details:

- This section is very important to complete for all projects involving buildings or structures that involve installation of equipment and/or ground disturbance.
- You will need to provide the age of your structure; this may be found by contacting the local planning department.
- Read and complete each bullet question.
- Provide complete installation details of all equipment and where it is to be installed.
- All ground disturbances should be described as Length x Width x Depth including quantity 1-14 etc. An aerial photo should be attached showing where all ground disturbance will occur.
- Building or structure construction date is required.
- For all buildings and structures, attach ground level color photos that are accurately labelled. Further guidance regarding photos is located in Appendix A of the EHP.

EHP Modifications



- You may not submit any changes to your equipment for EHP review that were not included in your Investment Justification (IJ) Application.
- No modifications requests will be considered until after application docs and EHP approval are completed
- If you need to modify equipment that was not included in your original IJ, you must first submit a detailed Reallocation or modification request to Cal OES justifying the change.
- The request must be on your organization's letterhead, signed by the authorized agent, and submitted to your program representative. Including a side-by-side comparison of the changes, capturing cost, time, equipment, and any other necessary information.
- Cal OES will review the Reallocation request, and then send it to DHS/FEMA for consideration/approval. (Approval is not guaranteed). If approved, your EHP submission would then need to reflect the approved, modified project(s).

EHP Examples



Example Photographs

Aerial Photographs. The example in Figure 1 provides the name of the site, physical address and proposed location for installing new equipment. This example of a labeled aerial photograph provides good context of the surrounding area.

Symbol	Equipment
0	Bollard
•	Camera
٠	Door

1927 13th St, Sacramento, CA 95811

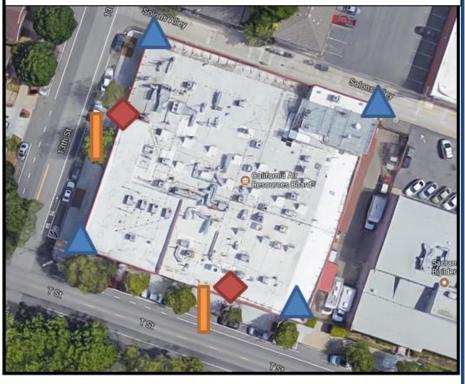


Figure 1. Example of labeled, color aerial photograph.

EHP Examples



Ground-level photographs. The ground-level photograph in Figure 2 supplements the aerial photograph in Figure 1, above. Combined, they provide a clear understanding of the scope of the project. This photograph has the name and address of the project site, and uses graphics to illustrate where equipment will be installed.



Figure 2. Example of ground-level photograph showing proposed attachment of new equipment

EHP Summary



- EHP reviews are **<u>Required</u>**.
- EHP reviews **must be approved** before work may begin or funds may be released for all equipment installation and may be required for training and exercise activities.
- EHP reviews are process driven; rarely any mandated outcomes.
- Complete scopes of work and clear documentation = EHP review foundation.
- Legwork upfront can shorten project review timeframes.
- Delays are caused by the following:
 - Poor or absent ground-level photographs.
 - Inadequate project description.
 - Poor or absent aerial photographs.
 - Extent of ground disturbance.
 - No project location (physical addresses or latitude-longitude).

EHP Examples



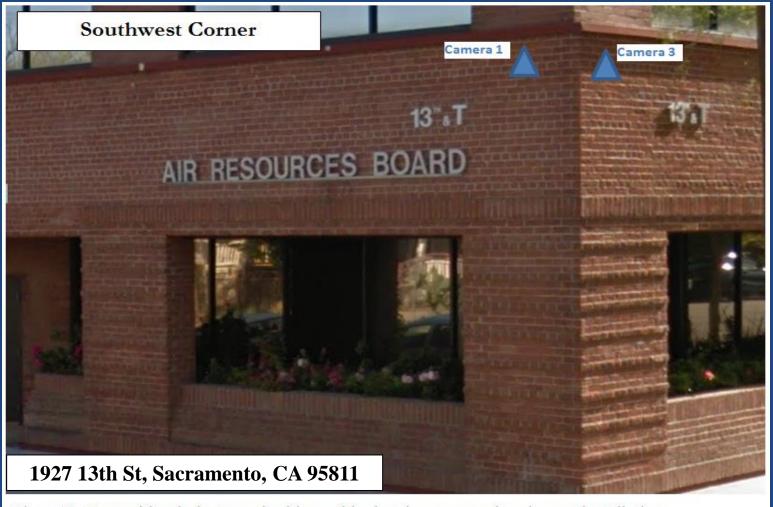


Figure 3. Ground-level photograph with graphic showing proposed equipment installation.



Appendix A – Photos:

Photos, maps, drawings, or other environmental documentation can be combined with the GPD EHP Screening Form to create one pdf file (recommended).

All photos should be labeled:

- showing project location
- location where equipment will be installed
- outlining ground disturbances
- Include no more than 2 photos per slide or page.

Plans, Drawings, Blueprints

Plans or blueprints can be used instead of **aerial** photos. Label plans/drawings with equipment type and location including an index.

EHP Submission Process



- Subrecipient completes and submits EHP for state review to their Cal OES representative.
- Cal OES reviews and submits EHP to DHS/FEMA for Approval.
- DHS/FEMA reviews and notifies Cal OES of EHP approval.
- Cal OES notifies subrecipient of approved EHP.

Only After the EHP has been approved and all required documents have been submitted and approved, can the subrecipient begin utilizing grant award,

And,

Depending on the age of the building or other factors, additional information may be required, for example, a CHRIS Report.



California Historical Resources Information System (CHRIS)

Reports: Grant-related report affecting some California properties that are over 50 years old.

(This MAY be required)

• The subrecipient must complete the form and pay a fee. After/if the EHP clears, grant funds may be used to reimburse this cost of the CHRIS Report Fee.



Allowable Costs Categories must correspond to what your organization requested in your <u>Investment Justification Application, and what</u> <u>was approved</u>.

- Planning
- Exercise
- Equipment
 - Maintenance and Sustainment
- Training
- Organization
 - Contracted Security Personnel
- Management and Administration (M&A)
 - Consultant/Contractor Costs
 - Personnel Costs
- Indirect Costs





Contract Provisions (§200.327)

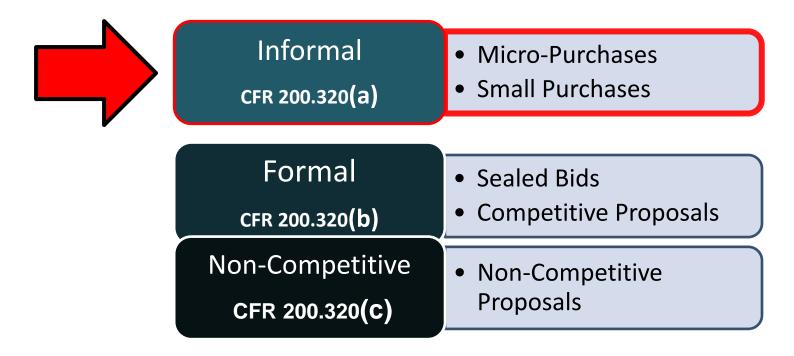
- Two contract clauses were added to Appendix II of Part 200.
 - Domestic Preference for Procurements
 - Prohibition on Contracting for Covered Telecommunications or Services



In accordance with <u>2 C.F.R. § 200.319</u>, all procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section.

Procurement Methods Grouped into 3 Categories

NSGP award amounts qualify under Informal Procurements



Procurement Requirements



Informal• Micro-Purchases2 C.F.R. § 200.320(a)• Small Purchases

Micro Purchases § 200.320(a)(1)	Small Purchases § 200.320(a)(2)
 Purchases up to \$10,000 	• Purchases \$10,001 to \$250,000
Price/Rate Quotations Not Required	• Minimum of 3 Price/Rate Quotations
 Reasonableness of Price/Rate must be documented 	• Maintain all procurement records, these include but are not limited to:
Reasonableness can be determined by research, experience, purchase history or other information	WHO – List of vendors WHEN – Dates WHAT – Quotes received WHY – Reason for selection of vendor

Procurement Requirements



- Follow your own documented procurement procedures
 - They must be in compliance with the Federal procurement standards at 2 C.F.R. § 200.318 – 200.327
- If there is any conflict between local or internal procurement procedures and the Federal procurement standards, you **must follow the more restrictive provision**
- Your procurement procedures must meet the minimum requirements of:
 - Obtaining a minimum of 3 quotes for purchases over \$10,000 (or a lower threshold as set in your procedures – Whichever is more restrictive)
 - Retention of all procurement records



For Procurements Greater than \$25,000

You <u>must</u> verify that the vendor is not suspended or debarred from participating in federal grant awards -<u>prior</u> to making a purchase or entering into a contract for services. It is strongly recommended that you use licensed contractors.

Visit the Federal Excluded Parties List System, under the <u>System for Award Management</u>. Enter the vendor's name and federal identification number (or individual's social security number).

Download a screen shot that shows the result "No Records Found" and place it in your grant binder.

Procurement Requirements



Search Records

Looking for entity registration records or entity exclusion records in SAM?

- * Use **Quick Search** if you know an entity's Business Name, DUNS number or CAGE code.
- * Use Advanced Search to structure your search using multiple categories and criteria.

Are you a Federal government employee?

* Create a SAM user account with your government e-mail address and log into SAM before searching to see FOUO information and registrants who chose to opt out of the public search.

Conducting small business-focused market research?

* In addition to what is contained in SAM, small businesses may supplement information about themselves in the SBA's Dynamic Small Business Search.

Trying to find a contractor participating in the Disaster Response Registry?

* Use the <u>new</u> **Disaster Response Registry Search** to search for contractors willing to provide debris removal, distribution of supplies, reconstruction, and other disaster or emergency relief services in the event of a national disaster.

QUICK SEARCH:		ADVANCED SEARCH: Use specific criteria in multiple categories to structure your	
WILE E COYOTE SECURITY EQUIPMENT		search.	
(Example of search term i	ncludes the entity's name, etc.)	ADVANCED SEARCH - ENTITY	
DUNS Number Search:	Enter DUNS number ONLY	ADVANCED SEARCH - EXCLUSION	
CAGE Code Search:	Enter CAGE code ONLY	DISASTER RESPONSE REGISTRY SEARCH	
SEARCH	Need Help?		

Procurement Requirements



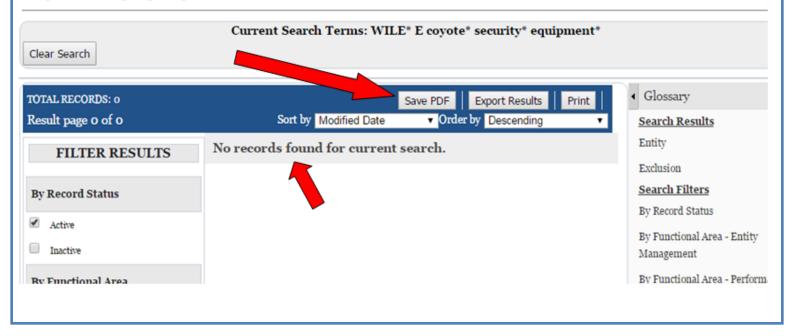
Search Results

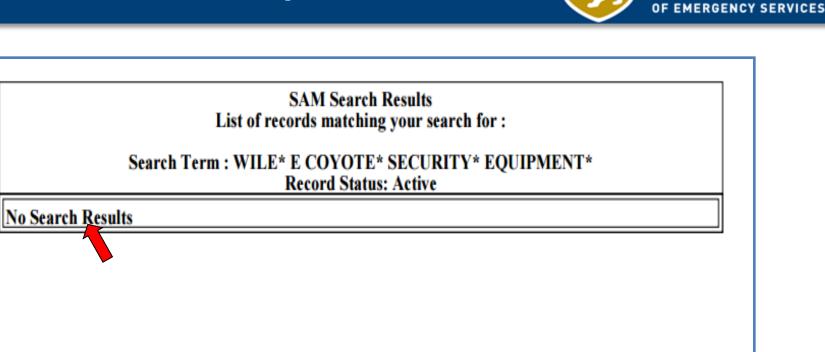
Your search results represent the broadest set of records that match your criteria. You may get entity registration records that are still in progress or have submitted, but not yet activated. Check the record status of each result and use the Search Filters to narrow your results.

Of note, some entities have chosen to opt out of public display. Even if they are registered in SAM, you will not see their entity registration records in a p search. You can only see them if you are logged in as a Federal Government user.

If you want to perform a new search, be sure to use the Clear Search button to remove your results. If you have a SAM user account and are logged in, you use the Save Search button to run your current search again at a later time.

Important message regarding exclusion searches.





Place these print-outs in your grant binder.

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Contract Provisions

Contracts must contain the applicable provisions
 described in <u>Appendix II to Part 200 of the CFR</u>

- <u>Contract Provisions Guide</u>
 - This document helps recipients and subrecipients understand which clauses are required for their contracts and includes sample language for those clauses.



Contracted Security Personnel

Contracted security personnel are allowed under this program only as described in the NOFO and Manual and comply with guidance set forth in IB 421b and IB 441. NSGP funds may not be used to purchase equipment for contracted security.

The recipient must be able to sustain this capability in future years without NSGP funding.

Pursuant to <u>6 U.S.C. § 609(b)</u>, NSGP funds may be used for security personnel costs, totaling up to 50%.



Allowable Costs are focused on target hardening activities. Funding is limited to two categories of items on the <u>Authorized</u> <u>Equipment List</u> (AEL):

- Physical Security Enhancement Equipment (category 14).
- Inspection and Screening Systems (category 15).

AEL Numbers and Titles will be entered in your Equipment Tab of your FMFW Workbook. They MUST match the categories you entered in your Investment Justification Application unless you have written modification approval to change them.

The equipment/inventory list must have all of the required elements as set forth in <u>CFR 200.313(d)(1)</u>.



Maintenance and Sustainment:

In accordance with <u>FEMA Information Bulleting #336</u> and <u>Maintenance</u> <u>Contracts and Warranty Coverage Funded by Preparedness Grants</u>:

 If purchasing maintenance agreement/service contract/extended warranty, it must not extend beyond the performance period of the grant.

Unless,

 If the maintenance agreement/service contract/extended warranty is purchased incidental (i.e. at the same time under the same grant award as) to the original purchase of the system or equipment, grantees may procure maintenance or warranty coverage which exceeds the period of performance.



Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services

In accordance with the <u>John S. McCain National Defense Authorization</u> <u>Act of Fiscal Year 2019 (FY 2019 NDAA)</u> and memorandum released from the Department of Homeland Security (DHS)/ Federal Emergency Management (FEMA):

 Beginning August 13, 2020, the statute—as it applies to FEMA recipients, sub-recipients, and their contractors and subcontractors prohibits obligating or expending federal award funds on certain telecommunications products and contracting with certain entities for national security reasons.

Per FY 2019 NDAA, covered telecommunications equipment or services means:

 Telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities)



Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services

- For the purpose of public safety, security of Government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunications equipment produced by:
 - Hytera Communications Corporation
 - Hangzhou Hikvision Digital Technology Company
 - Dahua Technology Company
 - or any subsidiary or affiliate of such entities
- Telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise connected to, the People's Republic of China



Management and Administration (M&A):

Subrecipients may use up to 5% of the amount subawarded to them solely for M&A purposes associated with the sub-award if that was requested at the time of application.

- Hiring of full-time or part-time staff or contractors/consultants to assist with the management and administration of NSGP funds.
- Meeting-related expenses directly related to M&A of NSGP funds.
- M&A costs must be justified through invoices or payroll records showing payment of services.

Allowable Cost: M&A – Consultant/Contractor



- It applies to 3rd party grant administrators or any paid contractors or consultants that were hired to work on the grant.
- You must detail work performed by the Consultant/Contractor to include pay rates, hours, and contract details.
- The Consultant/Contractor Tab will be included in your initial application if you plan to use a paid grant consultant.
- May require use of Personnel Tab to include hourly billing rates and details in regards to individuals working on the grant versus use of a firm.

Allowable Cost: M&A – Personnel Costs



- It applies to grant administrators or any paid personnel that work for the sub-awarded organization. This will be filled out in the Personnel Tab of the FMFW.
- This funding comes out of the M&A.
- It will require documentation that supports the hourly amount or rate of pay these individuals received for work performed on the grant.



Allowable training topics are limited to what you requested at the time of application, which were:

- Protection of critical infrastructure key resources
- Physical and cybersecurity
- Target hardening
- Terrorism awareness/employee preparedness:
 - Community Emergency Response Team (CERT) training
 - Active Shooter training
 - Emergency first aid training

Training costs are limited to attendance fees for training, and related expenses, such as materials, supplies, and/or equipment.

All training activities must receive Cal OES approval prior to starting the event via the Cal OES <u>Training Request Form</u>.

Talk to your Program Representative for more information.

Indirect Costs



Indirect costs, if applied for, are allowable under the FY 2021 NSGP Grant Award and are **Not in addition** to the M&A allowance. Subrecipients who claimed indirect costs may do so provided they use one of the following two methods:

 Subrecipients with an indirect cost rate approved by their cognizant federal agency may claim indirect costs based on the established rate.

Or;

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.

Indirect Costs



In accordance with <u>2 CFR § 200.414</u> typical examples of indirect (F&A) cost for many nonprofit organizations may include;

- depreciation on buildings and equipment
- costs of operating and maintaining facilities
- general administration and general expenses
 - salaries and expenses of executive officers
 - personnel administration
 - Accounting

Indirect costs can be taken from all grant activities except equipment costs.

9) Financial Management Forms Workbook



The Financial Management Forms Workbook (FMFW) is...

- the central accounting workbook that is a complete record of your project activities.
- a living document where spreadsheets are added for each new transaction, such as cash advances, reimbursements, or modifications.
- You can print individual sheets or your entire workbook.
- It has built-in equations and drop-down menus that must not be altered. It is to be sent to Cal OES representatives as an e-mail attachment and once approved, printed, signed, and mailed to our office.

The FY 2021 Cal OES FMFW will be provided by your program representative.



We will now open a copy of the workbook for a demonstration.





Required for all transactions:

<u>Cash Advance</u> - is an advance of your funds. A first advance can be no greater than 50% of your total grant funding at a time. (Equipment funded by an advance must be installed, paid for and the equipment tab must be updated with project details before further funding can be requested).

<u>Cash Reimbursements</u> - repay the nonprofit organization after they use their own funds to implement a project.

<u>Modification</u> - is used for making budget or scope-of-work changes. Adding or eliminating equipment found in the Investment Justification (IJ) must be requested in writing. Request should be on nonprofit letterhead, bearing an authorized agent signature. A Modification Form must be completed and approved.

All documents must be signed <u>Approved</u> by your Cal OES Program Representative.



As of September 1, 2017, in accordance with <u>2 CFR §200.308</u> -Revision of budget and program plans needs to be communicated to Cal OES for FEMA approval:

- Any changes in key grant administration personnel
- Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval)

Modifications



NSGP Investment Modifications – Changes in Scope or Objective Changes in scope or objective of the award—whether as a result of intended actions by the recipient or subrecipients—require FEMA's prior written approval, in accordance with 2 C.F.R. §§ 200.308(c)(1)(i), 200.407.

NSGP is competitive, with applications recommended for funding based on threat, vulnerability, consequence, and their mitigation to a specific facility/location. However, consistent with 2 C.F.R § 200.308(c)(1)(i),

Change in Scope Notification, DHS/FEMA requires prior written approval of any change in scope/objective of the grant-funded activity after the award is issued. See 2 C.F.R. § 200.308(b), (c).

Scope/objective changes will be considered on a case-by-case basis, provided the change does not negatively impact the competitive process used to recommend NSGP awards.



If a subrecipient wants to seek a modification they must:

Have a written request submitted on letterhead, outlining the scope or objective change, including the approved projects from the subrecipient's Investment Justification (IJ), 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 why the change of scope or objective is necessary;
- Include supporting documents, i.e. assessments, bids, estimates, regulations.
- Validation from the SAA that any deviations from the approved IJ are addressed in the vulnerability assessment submitted by the subrecipient at the time of application; and
- The subrecipient request must also address whether the proposed changes will impact its ability to complete the project within the award's period of performance.

The Subrecipient must also fill out the Cal OES modification Form

Modifications



Modifications are used for budget or scope-of-work changes.

- <u>Adding</u> or <u>eliminating</u> equipment found in the Investment Justification (IJ) must be requested in writing. Request should be on nonprofit letterhead, and authorized agent signature.
- Organization must complete the Cal OES Modification Request Form.
- Cal OES will preview the request and forward it to FEMA for approval.
- Your modification may require submission of a revised EHP screening.
- You **must** receive written approval **before** implementing the budget or scope-of-work changes.
- Work with your program representative to make the necessary changes to the Workbook.

How to Receive Funding



- Ensure all of your required application documents are Received and Approved by Cal OES.
- Make sure you are utilizing the current FMFW before you begin
- Ensure your EHP review has been approved by FEMA.
- Wait to receive your official EHP Clearance Letter.
- <u>Email</u> a draft Cash Advance or Reimbursement request from the workbook to the program representative. The program representative will then guide you through the rest of the process.
- It may take up to 6-8 weeks in order to receive any funds from the State Controller's Office once your advance or reimbursement is APPROVED.



Advances are a privilege within the NSGP provided by Cal OES with additional conditions.

Subrecipients must have projects "ready to go" in order to request an advance.

You must fill out the Cash Advance Form and your FMFW.

Advances **must be spent within 120 days** of receiving the advance check from Cal OES.

Unspent advance funds must be returned to Cal OES at the end of the 90 day advance expenditure period.



You will not be able to receive a Cash Request or another Cash Advance until you fulfill these requirements.

The **Final** Cash Advance for the FY 2021 NSGP must be approved by your Program Representative by:

December 31, 2023

After that date only Cash Requests (Reimbursements) will be processed.



Reimbursements are the primary and preferred method of payment for Cal OES.

Subrecipients complete projects and submit completed detailed invoices and proof(s) of payment to their program representative.

Approved reimbursements via the workbook are received and processed by Cal OES initiating payments.

Checks are issued and mailed directly to subrecipients.



- 1. Open your FMFW and **Enable the macros**. (Note: Please follow the directions on how to enable macros on the instructions tab.) Do not delete any of the original tabs of the workbook. Always save your workbook changes. Always 'save-as' a macro-enabled workbook.
- 2. Click on the most up-to-date "Project Ledger" tab.
- 3. Click on "NEW REIMB/MOD REQUEST" macro button in Cell H-17 on the "Project Ledger" tab to make a copy of the "Project Ledger."
- 4. Enter the name of your new REIMB/Modification request. (For example: PL ADV 1 or PL CR 1).
- 5. Click on "Cash Request" macro button. Cash Request number.



- 6. Enter the amount you are requesting into "Amount This Request" column.
- 7. Review for accuracy. IMPORTANT: Steps 4-6 must be completed individually for the Equipment Inventory spreadsheet.
- 8. Click on "Authorized Agent" tab. Select "Cash Request" macro button.
- Email workbook to your program representative for preview/approval of all tabs before you date, print name and sign the authorized agent tab.
- 10. Mail transaction spreadsheets to the Cal OES program representative Only after your Program Representative has approved it and has provided you additional instructions.

Subrecipient Accounting



- 1. Have or Create a tracking system that will track the funds in and out of the account.
- 2. Follow your own procurement policy and/or the CFR for each approved project or whichever policy is most restrictive.
- 3. Subrecipient submits FMFW request to Cal OES via email for preview/approval.
- 4. Do not request funds for one project (example: lighting) and use it for a different project (example: fencing).

Written Standards of Conduct and Procurement



It is required that each subrecipient have written standards of conduct covering conflicts of interest in procurements and contracting, <u>Title 2 CFR</u> <u>§200.318 (c)(1)</u> The non-Federal entity <u>must maintain written standards</u> of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contract.

No employee, officer or agent may participate in the selection, award or administration of a supported by a Federal award if he or she has real or apparent conflict of interest. The standards of conduct must provide for disciplinary actions to be applied for violation of such standards by offers, employees, or agent of the non-Federal entity. Please see Title 2 CFR, Part 200 for the full language of the requirement.

Conflict of Interest



In accordance with <u>2 C.F.R. § 200.112</u>, in order to eliminate and reduce the impact of conflicts of interest in the subaward process, recipients and pass-through entities <u>must follow their own policies and procedures</u> regarding the elimination or reduction of conflicts of interest when making subawards.

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.

- The Conflict of Interest policy must include any disciplinary actions for violations.
- Per federal regulations found in <u>CFR 200.318(c)</u>, the standard of conducts covering conflict of interest must include disciplinary actions for noncompliance.

Estimate/Invoice Requirements



Must include the following:

Contractor/Service Providers License Number Invoice/Estimate Number <u>Make</u> - (manufacturer/brand name) <u>Model</u> - (manufacturer's model name and number) <u>Quantity</u> - (amount purchased) <u>Unit Cost</u> – (dollar amount per item)

- Signature of Preparer/Representative of the Contractor/Service
 Provider
- Any Miscellaneous/installation equipment should be listed separately and include the details of what is included (This expense must be verifiable and reasonable)
- Labor/installation cost should be listed separately and detailed
- State/Local taxes should be listed separately
- 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.

Sample Bid/Invoice



[Your stady I ee rodress] Cont ZIP Co rone] Fax [000-000-000 [E-mail address]	-	TO [Name] [Company [Street Ad [City. ST [Phone] Customer	dress]			
SALESPERSON	JOB	SHIPPING METHOD	SHIPPING	DELIVERY DATE	PAYMENT	DUE DATE
John A. Doe	Contractor	Delivery	N/A	June 15, 2017	Due on receipt	June 20,2017
QTY	ITEM #	DESCRIPTION		UNIT PRICE	DISCOUNT	LINE TOTAL
7	1000009	Sony DX25 Camera		\$109.00	\$0.00	\$763.00
1	1000006	Sony HD45 2TB HardDrive		\$89.00	\$0.00	\$89.00
1	1000011	Sony D320 DVR		\$240.00	\$0.00	\$240.00
3	1000007	Sony LX240, 24in HD Monitor		\$125.00	\$0.00	\$375.00
1	1000008	RG58 C/U Coaxial Cable, Std 1000ft Roll		\$300.00	\$0.00	\$300.00
1	1000005	Installation		\$1,500.00	\$0.00	\$1,500.00
	1		1	TOTAL DISCOUNT	0.00	
				L	SUBTOTAL	\$3,267.00
					SALES TAX	\$285.86
					TOTAL	\$3,552.86

This is a quotation on the goods named, subject to the conditions noted below: (Describe any conditions pertaining to these prices and any additional terms of the agreement. You may want to include contingencies that will affect the quotation.)



Acceptable Proofs of payment are:

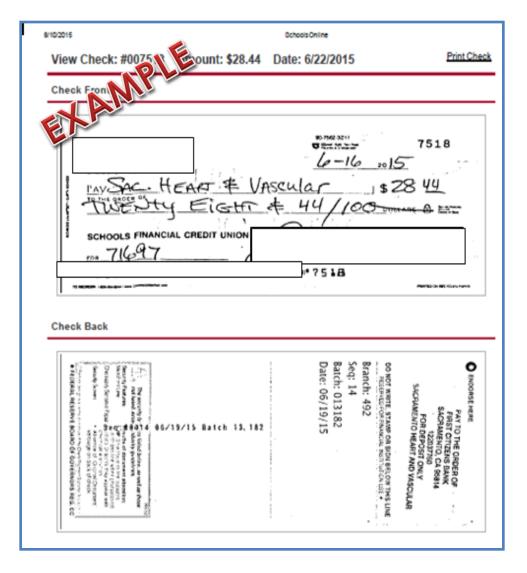
- Bank Checks
- Cashier's Checks
- Money Orders
- Credit/Debit charges must be supported by transaction slip or bank statement.

Note: all invoices must be accompanied by a proof of payment for reimbursements.

Proof(s) of Payment



- Must be Legible
- Bank Names
- Routing Dates
- Routing Sequence
- Routing Batch
- "For"= Invoice #
- Vendor
 Endorsement
- Checks must be drawn from subrecipient's Business accounts not from personal account





In accordance with <u>2 CFR §200.313</u> Equipment, you must keep an inventory control system for all equipment as well as all supporting documentation such as bids, contracts, invoices, software licenses and payment records.

Conduct and document a physical inventory once every 2 years.

Equipment inventory records should contain all of the following;

- Equipment Description
- Equipment Condition
- Equipment Location
- Equipment ID Number
- Disposition data/sales price (if applicable)

- AEL #s and Titles
- Vendor Identification
- Equipment Cost
- Acquisition Date
- Title/Title Holder



In accordance with <u>2 CFR § 200.313</u> Equipment, certain conditions must be met as part of the procurement, usage, and disposal of equipment purchased with federal funds;

- Equipment purchased with federal funds must only be used for the program or project it was acquired through.
- If equipment is to be replaced the subrecipient may use the previously purchased equipment as trade-in or sell the property and use the proceeds towards the replacement equipment,
- Must maintain property records to include serial numbers, source of funding, acquisition date, property owner, and disposition including dates of disposal or sale prices.
- Subrecipient must ensure appropriate safeguards exist to prevent loss, damage, or theft.

Vendor Licensing



The State of California, Contractor's State License Board requires that anyone charging \$500 or more to perform construction work must be licensed. In accordance with <u>CA</u> <u>Business and Professions Code Division 3, Chapter 9, Article 3,</u> <u>Exemption 7048</u>.

- Make sure your contractor possesses the correct license certification (is qualified to install your equipment)
- Per <u>CFR 200.326</u>, all contracts must contain the applicable provisions described in Appendix II to Part 200

Contractors are required to place their license number on business cards, bids, and contracts.

Licensing information and status can be verified at the Department of Consumer Affairs, <u>Contractors State License</u> <u>Board</u>.

Accountability Requirements



- Suspension or Termination
- Noncompliance
- Biannual Strategy Implementation Report
- Record Retention Rules
- Semi-Annual Drawdown Requirements
- Grants Monitor Review

Suspension or Termination



Cal OES may suspend or terminate subrecipient 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.

Noncompliance



In accordance with <u>2 CFR § 200.338</u> Remedies for Noncompliance, the state could:

- Impose additional conditions if the subrecipient fails to comply with federal statutes,
- Temporarily withhold cash payments until deficiencies are resolved,
- Disallow (deny) funds for all or part of the activity or action not in compliance,
- Wholly or partly suspend or terminate the federal award,
- Initiate disbarment proceedings with the federal awarding agency,

The federal awarding agency could withhold further federal awards or take other remedies that may be legally available.

Biannual Strategy Implementation Reports (BSIR) via the Grant Reporting Tool (GRT)



- The Purpose of the BSIR is to measure performance of the subawarded organization in utilization of the grant funding over the course of the period of performance until the close of the grant occurs.
- Each Subrecipient in accordance with <u>2 CFR § 200.328</u>, Monitoring and reporting program performance, will report via the Grants Reporting Tool
- All subawarded organizations <u>must</u> participate in at least one BSIR training each reporting period.
- The reporting requirement begins once the organization receives the official Award letter from Cal OES.

Grants Reporting Tool

Biannual Strategy Implementation Reports (BSIR) via the Grant Reporting Tool (GRT)



- Reporting cycle for the BSIR is every 6 months
 - Summer BSIR: January 1 through June 30
 - Winter BSIR: July 1 through December 31
- Provides progress on implementation of projects and how expenditures support Planning, Organization, Equipment, Training, and Exercise (POETE)
- Data collected from the GRT are used in reports to congress
- **Timely submission is a must.** Failure to submit a BSIR could result in subaward reduction, termination, or suspension.

Record 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. You must also keep the following any grant related material to include:

- Official letters; Subrecipient award letters, EHP approval letter, and all Cal OES transmittals of information
- Copies of the required application documents submitted to Cal OES
- Copies of the EHP submissions
- Copies of each transaction, such as modifications and cash requests
- All other correspondence and official announcements

If documents are retained longer than the required retention period, FEMA, the DHS Office of the Inspector General, Government Accountability Office, and Cal OES entity have the right to access these records. Reference 2 C.F.R. §§ 200.333, 200.336.

Semi-Annual Drawdown Requirements



- All subrecipients must report expenditures and request funds at least semi-annually throughout the performance period. Exceptions will be considered on a case-by-case basis and must be specifically authorized in writing *in advance* by Cal OES.
- Semi-annual drawdowns must occur no later than March 31 and October 31 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 days of the end of the performance period.



Cal OES reviews all subrecipients who received grant awards.

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:
 - o Grant Assurances, and
 - Information provided on performance reports and payment requests.



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.

Applicable Laws & Terminology



- Title 2, Code of Federal Regulations (CFR) Part 200 UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS
- Subrecipient the organization in receipt of the grant funding from the State Administrating Agency (SAA)
- FEMA Information Bulletin (IB's) provide stakeholders with administrative instructions and guidelines critical to supporting the effectiveness and efficient delivery of FEMA Grant Programs
- Grants Management Memorandum (GMM) provides stakeholders with instructions and guidelines critical to the delivery of Cal OES supported programs within the Grants Management Division
- Period of Performance September 1st, 2021 to May 31st, 2024. Activities that occur between these dates are reimbursable with some conditions.

Useful Links



- <u>Authorized Equipment List</u>
- Bureau of Security & Investigative Services
- <u>Cal OES Grants Management Documents</u>
- Department of Consumer Affairs, Contractors State License Board
- <u>Environmental Planning and Historic Preservation</u> <u>Compliance</u>
- <u>National Historic Preservation Act</u>
- <u>NOFO</u>
- Preparedness Grants Manual
- <u>State Supplement</u>
- <u>State Supplement Attachment A; Sub awardee list</u>
- <u>Title 2, Code of Federal Regulations, Part 200</u>

Required Documents



- 1. Payee Data Record (STD 204) Printout of IRS, SOS, FTB, DOJ
- 2. 501(c)(3) Certification
- 3. Federal Funding Accountability and Transparency Act (FFATA) Financial Disclosure
- 4. Governing Body Resolution
- 5. Grant Assurances
- 6. Subrecipient Grant Management Assessment Form
- 7. Certification Regarding Lobbying
- 8. Environmental Planning and Historic Preservation (EHP) Screening Form
- 9. Financial Management Forms Workbook (FMFW) Overview

All of the required application documents must be received and approved by Cal OES before you will be able to request an advance or reimbursement of funds.

Please submit All Required Documents via email to your Program Representative By November 17, 2021.

All required documents MUST be validated with Program Representative approval no later than December 1, 2021.



Please submit All Required Documents via email to your Program Representative By November 17, 2021.

All required documents MUST be validated with Program Representative approval no later than December 1, 2021.

Contact us at 916-845-8410 or NonProfit.Security.Grant@CalOES.ca.gov



The Infrastructure Protection Grant Unit is responsible for the overall grant management of the Nonprofit Security Grant Program (NSGP).

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