



GRANTS MANAGEMENT MEMORANDUM
GMM 2026-05

Date: February 9, 2026

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

From: Cal OES Grants Management

Subject: Clarification on the Simplified Acquisition Threshold (SAT) Requirement for Noncompetitive Procurement Authorizations

This Memorandum is intended to clarify the applicable threshold that requires HSGP and EMPG Subrecipients to obtain Cal OES prior approval for noncompetitive procurements.

Per GMM 2020-22, noncompetitive procurements in excess of the Simplified Acquisition Threshold (SAT), as determined by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 and in accordance with 41 U.S.C. 1908 (which was previously set at \$250,000), require prior approval from Cal OES.

Effective October 1, 2025, the Federal Acquisition Regulation increased the SAT from \$250,000 to \$350,000.

While the SAT increase has taken effect, **Cal OES maintains the requirement that HSGP and EMPG Subrecipients must request and receive written approval from Cal OES for noncompetitive procurements that exceed \$250,000** which are to be funded in whole or in part by HSGP or EMPG awards, *prior to obligating Federal funding for the procurement.*



Maintaining \$250,000 as the applicable threshold is intended to support compliance with noncompetitive procurement requirements and mitigate the risk of disallowed costs.

Additionally, Cal OES prior approval is required for all HSGP-funded noncompetitive procurements of training, regardless of the dollar amount, per GMM 2020-22.

If you have any questions or need further clarification, please contact your assigned Cal OES Grants Analyst.