



## **FY2021 Urban Areas Security Initiative Grant Program**

### **Anaheim / Santa Ana UASI Sub-Recipient Grant Guide Standard Operating Procedures, Policies, and Forms**

August 2022

Version 1

### **PURPOSE AND ORGANIZATION OF THIS GUIDE**

The FY2021 Urban Areas Security Initiative Grant Program Sub-Recipient Grant Guide is a reference for agencies receiving federal funds through the Anaheim/Santa Ana UASI Offices. The Guide will help sub-recipients understand and meet the financial, administrative, and audit requirements for the use of these funds. The primary source documentation for these requirements is the U.S. Department of Homeland Security “The Department of Homeland Security (DHS) Notice of Funding Opportunity (NOFO) Fiscal Year 2021 Homeland Security Grant Program,” the California Governor’s Office of Emergency Services “Fiscal Year 2021 Homeland Security Grant Program: California Supplement to Federal Notice of Funding Opportunity”, and 2 Code of Federal Regulations (CFR) Part 200 “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.” Please see page seven of this guide for links to the above-mentioned guidance and regulations.

Sub-recipients must meet certain requirements to receive funding from federally funded grant programs. The requirements contained in this Guide are not all-inclusive. In addition, other source materials will be referenced. Sub-recipients are encouraged to contact the Anaheim/ Santa Ana UASI Offices for clarification of any requirements.

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## **Part 1 – FY21 UASI Grant Overview**

### **Overview**

The Homeland Security Grant Program (HSGP) is comprised of three interconnected grant programs.

- State Homeland Security Program (SHSP)
- Urban Areas Security Initiative (UASI)
- Operation Stonegarden (OPSG)

The HSGP is one tool among a comprehensive set of measures authorized by Congress and implemented by the Administration to help strengthen the nation against risks associated with potential terrorist attacks. Under the HSGP, the cities of Anaheim and Santa Ana were selected as core cities for the Orange County Metropolitan Area and are responsible for the management and administration of the UASI Grant Program.

The UASI grant program is designed to address the unique planning, equipment, training and exercise needs of high-threat, high-density Urban Areas, and assist them in building an enhanced and sustainable capacity to prevent, protect against, respond to, and recover from acts of terrorism. The UASI grant program, as part of the HSGP, is meant to support the Federal government's larger, coordinated effort to strengthen homeland security preparedness. The HSGP implements objectives addressed in a series of post 9/11 laws, strategy documents, plans, and Homeland Security Presidential Directives (HSPDs). Of particular significance is the National Preparedness Goal (NPG) and its associated work products. The Goal defines what it means for the whole community to be prepared for all types of disasters and emergencies. The National Preparedness Goal is defined as: "A secure and resilient Nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk." In addition to stating the goal, the document describes 32 activities, called core capabilities, which address the greatest risks to the nation. These core capabilities require the combined efforts of the whole community and are essential for the execution of each of the five mission areas: Prevention, Protection, Mitigation, Response, and Recovery.

As described in the Goal, the 32 core capabilities are the distinct critical elements necessary for our success. They are highly interdependent and will require us to use existing preparedness networks and activities, improve training and exercise programs, promote innovation, and ensure that the administrative, finance, and logistics systems are in place to support these capabilities. The capabilities are grouped into the five mission areas, with some capabilities aligning under one mission area, and others applying to several mission areas (see Table 1 on page 5).

Projects funded through the Anaheim/Santa Ana UASI should be developed using a capabilities-based planning approach and make use of the "Core Capabilities" (<https://www.fema.gov/core-capabilities>), keeping in mind a capability may be delivered with any combination of properly planned, organized, equipped, trained and exercised personnel that achieve the intended outcome. Just as no single agency/jurisdiction would be expected to perform every task, neither would they be expected to have sufficient levels of every capability needed for a major event. Requirements that exceed an entity's capabilities would be secured through mutual aid or formal

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requests for assistance from other levels of government. This concept is the basis for strengthening regional planning, coordination, and resource sharing to prepare for catastrophic events. A key factor in determining what projects will be funded is the ability of the project to achieve a regional capability.

**Table 1: 32 Core Capabilities by Mission Area**

Prevention	Protection	Mitigation	Response	Recovery
<b>Planning</b>				
<b>Public Information and Warning</b>				
<b>Operational Coordination</b>				
<b>Intelligence and Information Sharing</b>		<b>Community Resilience</b>	<b>Infrastructure Systems</b>	
<b>Interdiction and Disruption</b>			<b>Critical Transportation</b>	<b>Economic Recovery</b>
<b>Screening, Search, and Detection</b>				
<b>Forensics and Attribution</b>	<b>Access Control and Identity Verification</b>	<b>Risk and Disaster Resilience Assessment</b>	<b>Fatality Management Services</b>	<b>Housing</b>
	<b>Cybersecurity</b>	<b>Threats and Hazards Identification</b>	<b>Fire Management and Suppression</b>	<b>Natural and Cultural Resources</b>
	<b>Physical Protective Measures</b>		<b>Logistics and Supply Chain Management</b>	
	<b>Risk Management for Protection Programs and Activities</b>		<b>Mass Care Services</b>	
	<b>Supply Chain Integrity and Security</b>		<b>Mass Search and Rescue Operations</b>	
			<b>On-scene Security, Protection, and Law Enforcement</b>	
			<b>Operational Communications</b>	
			<b>Public Health, Healthcare, and Emergency Medical Services</b>	
			<b>Situational Assessment</b>	

The FY2021 UASI program is intended to enhance regional preparedness efforts. Urban Areas **must** use these funds to employ regional approaches to overall preparedness and are encouraged to adopt regional response structures whenever appropriate. UASI program implementation and governance must include regional partners and should have balanced representation among entities with operational responsibilities for prevention, protection, mitigation, response, and recovery activities within the region.

In an effort to assist the urban area’s sub-recipients in understanding how to apply for funding and seek reimbursement for approved expenditures, the Anaheim/Santa Ana UASI grant office has developed a guide. The purpose of the Anaheim/Santa Ana Sub-Recipient Grant Guide is to

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provide: (1) an overview of the UASI grant program; (2) pre-award guidelines; (3) project application process; (4) reporting, procurement, and reimbursement requirements; (5) financial and equipment monitoring guidelines; and (6) closeout of the grant program.

### **FY21 Homeland Security Grant Program Priorities**

- Build, sustain, and deliver core capabilities in order to achieve the National Preparedness Goal of a secure and resilient Nation; HSGP funded investments must have a terrorism-nexus.
- For the FY21 HSGP grant, a minimum percentage of total awarded funds must be allocated towards each of the five national priority areas identified in the 2021 Notice of Funding Opportunity (NOFO) as listed below:
  - Enhancing cybersecurity (including election security) – 7.5%;
  - Enhancing the protection of soft targets/crowded places (including election security) – 5%;
  - Enhancing information and intelligence sharing and cooperation with federal agencies, including DHS – 5%;
  - Combating domestic violent extremism (new) – 7.5%; and
  - Addressing emergent threats, such as Transnational Criminal Organizations, Unmanned aircraft systems (UASs), weapons of mass destruction (WMD) – 5%.
- Additional FY21 HSGP investment strategy areas and enduring needs include:
  - Effective planning;
  - Training and awareness campaigns;
  - Equipment and capital projects; and
  - Exercises.
- Address gaps identified through the annual State Preparedness Review (SPR) in achieving capability targets set through the annual THIRA.
- For FY21, applicants are no longer required to include an election security project.

### **FY21 Anaheim/Santa Ana UASI Projects**

In accordance with the ongoing projects, HSGP Guidance, National Preparedness Guidance, and the Anaheim/Santa Ana UASI Grants Strategy, the following are projects proposed in the FY21 Investment Justifications (**NP** = National Priority area):

+Project C – Addressing Emergent Threats (NP) Aviation Command Trailer, Regional Training & Exercise Program for Law Enforcement and Fire

+Project E – Enhancing the Protection of Soft Targets/Crowded Places (NP) Sustain Orange County Civic Center Video Surveillance System; “If You See Something, Say Something” Campaign; Regional Training and Exercises for Law Enforcement (including Active Shooter Drill and TECC)

+Project G - Enhance Community Resilience, Including Partnerships with Volunteers and Community Based Organizations and Programs Sustain the “ReadyOC” Preparedness Campaign; Regional Training & Exercise Program for Emergency Management; Training & Exercise Program Coordinator

+Project J – Enhancing Information and Intelligence Sharing and Cooperation with Federal

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Agencies, including DHS (NP) ALPR Cameras and Maintenance; continue funding Analyst and Program Manager Salaries at Orange County Intelligence Assessment Center (OCIAC), and the following equipment needs: real time open source analysis, analytical research systems, and data sources; Health Care Liaison Officer; Analyst Proficiency Training.

+Project L - Management & Administration Cover salaries, meeting costs, and travel expenditures related to grant management and administration.

+Project O - Enhancing Cybersecurity (NP) Salary and personnel costs for Cyber Systems Analysts, Cyber Intelligence Analyst at the Orange County Intelligence Assessment Center (OCIAC); Cyber Program Advisor; Cybersecurity training and tabletop exercises; and Cybersecurity Equipment.

+Project P - Combating Domestic Violent Extremism Through Enhanced Intelligence Collection & Analysis, Training, and Community Resilience (NP) Salary and personnel cost for Domestic Violent Extremism Analysts assigned to the Orange County Intelligence Assessment Center; Training Courses for Terrorism I,II,III

### **Anaheim/ Santa Ana Urban Area Working Group (UAWG)**

Homeland Security grants guidelines specifically require the formation of an Urban Area Working Group to “coordinate the development and implementation of all program initiatives”. The federal guidance requires the use of existing working groups and committees to plan and implement grant related activities and to coordinate grant resources. In order to accomplish this task, the Urban Area Working Group (UAWG) functions as the primary advisory body to the Anaheim/Santa Ana Urban Area Steering Committee.

The mission of the UAWG is to provide recommendations to the Steering Committee through the identification, prioritization and development of a standardized, regional, all-hazards approach to increase preparedness, prevention, protection, response, and recovery capabilities through the coordinated, collaborative efforts of multi-jurisdictional, multi-disciplined representatives from the Orange County Operational Area. The UAWG will be responsible for coordinating the development and implementation of all program initiatives and act in an advisory capacity to the Steering Committee regarding activities related to the Urban Areas Security Initiative (UASI).

### **FY21 UASI Grant Performance Period**

The California Governor’s Office of Emergency Services’ Performance Period for the Anaheim/ Santa Ana Urban Area is September 1, 2021 to May 31, 2024. However, the Sub-Recipient Performance Period for the FY21 UASI Grant Program is **August 10, 2022 to March 31, 2024.**

UASI Grant CFDA #: 97.067      UASI Grant #: 2021-0081      FIPS#: 059-95010

FY21 Anaheim/Santa Ana UASI Award: \$4,278,750

FY21 HSGP Fusion Center Award to OCIAC: \$835,000

### **Federal Grant Guidance:**

- “Fiscal Year 2021 Homeland Security Grant Program (HSGP) Notice of Funding Opportunity (NOFO)”  
([https://www.fema.gov/sites/default/files/documents/FEMA\\_FY2021-HSGP-NOFO\\_02-19-21.pdf](https://www.fema.gov/sites/default/files/documents/FEMA_FY2021-HSGP-NOFO_02-19-21.pdf))

### **California State Grant Guidance:**

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- “Fiscal Year 2021 Homeland Security Grant Program: California Supplement to Federal Notice of Funding Opportunity” (<https://www.caloes.ca.gov/wp-content/uploads/Grants/Documents/FY-2021-HSGP-State-Supplement.pdf>)

**Administrative, Cost Principles, and Audit Guidelines:**

- Title 2 Grants and Agreements Code of Federal Regulations (CFR) “Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (<https://www.govinfo.gov/content/pkg/CFR-2020-title2-vol1/pdf/CFR-2020-title2-vol1.pdf> - Part 200 starts on page 77)

**Entities Covered by the FY21 UASI Grant Program\***

Anaheim	La Habra	Placentia
Aliso Viejo	La Palma	Rancho Santa Margarita
Brea	Laguna Beach	San Clemente
Buena Park	Laguna Hills	San Juan Capistrano
Calif. State University, Fullerton	Laguna Niguel	Santa Ana ( <b>Lead</b> )
Costa Mesa	Laguna Woods	Santa Ana Unified School District
Cypress	Lake Forest	Seal Beach
Dana Point	Los Alamitos	Stanton
Fountain Valley	Mission Viejo	Tustin
Fullerton	Newport Beach	University of California, Irvine
Garden Grove	Orange	Villa Park
Huntington Beach	Orange County	Westminster
Irvine	Orange County Fire Authority	Yorba Linda
Juaneño Band of Mission Indians		Municipal Water District of Orange County

\*In FY04 and FY05 UASI Grants, Anaheim and Santa Ana each had their own UASI Grant award. DHS combined cities starting with the FY06 UASI Grant. In even years (06, 08, 10, 12, 14, 16, 18, 20) Anaheim is the lead fiscal agent and in odd years (07, 09, 11, 13, 15, 17, 19, 21) Santa Ana is the lead fiscal agent.

**Part 2 – Pre-Award Guidelines**

**Sub-recipient Agreement/Eligibility Packets:**

All members of the Anaheim / Santa Ana Urban Area are considered sub-recipients and are eligible to submit an application for project funding to the Anaheim / Santa Ana UASI for grant funds. Prior to submitting an application, each sub-recipient must establish their eligibility to receive grant funds by submitting an eligibility package. The eligibility packet must include:

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- The FY21 Anaheim/Santa Ana UASI Agreement (**2** signed copies)
- Signed Grant Assurances (Exhibit A of Agreement)
- Debarment, Suspension and Other Responsibility Matters (Exhibit B of Agreement)
- Signed Certifications Regarding Lobbying (Exhibit C of Agreement);
- Completed and signed ASUA Sub-Recipient Grants Management Assessment
- Copy of Governing Body Resolution (or equivalent) accepting FY21 UASI Grant Funds
- Copy of Sub-Recipient's Procurement Policy
- Copy Sub-Recipient's Travel Policy
- Copy of Sub-Recipient's Equipment Control and Disposition Policy
- Copy of 2020/2021 Single Audit Report (If the sub-recipient expends more than \$750,000 in federal assistance they must perform a single audit and provide a copy of the audit results to the Anaheim/Santa Ana UASI Grant Office. The \$750,000 threshold in federal assistance is an aggregate total and is not limited only to UASI funds. Refer to 2 CFR 200.501)

Eligible sub-recipients must have a Unique Entity Identifier (UEI) number and be currently registered in the System Award Management (SAM) to receive funding. Information on obtaining a UEI number and registering in SAM is available online (<http://Grants.gov/web/grants/register.html>).

Sub-recipients may not sub-award Anaheim/Santa Ana UASI funds awarded to them. UASI funds may only be used to reimburse sub-recipients for allowable grant expenditures that have received prior approval from the Anaheim/Santa Ana grant office.

### **Deadline to Submit Eligibility Packet and Agreement:**

A completed packet, including all of the above listed documentation, **MUST** be turned into the Santa Ana UASI Grant Office, no later than **Friday, November 18, 2022.**

## **Part 3 – Project Application Guidelines**

### **Overview**

In an effort to gather the information required to document the allocation of UASI grant funds and to collect the information necessary to accurately record how the funds will be utilized, all sub-recipients are required to submit an "Application for Project Funding" prior to being authorized to expend funds for which they will be reimbursed. A copy of the "Application for Project Funding" will be sent to all project managers during the ASUA Grant Investment Justification and Application process and is available upon request.

The Application for Project Funding is comprised of 10 sections designed to collect the information necessary to determine:

- 1) what capability(ies) the project is designed to establish or enhance;
- 2) if the project supports the urban areas strategy, THIRA, and State Preparedness Report;
- 3) how much the project will cost;
- 4) how the project will be implemented; and

5) how the project will be sustained.

### **Supplanting**

Grant funds must be used to supplement existing funds, not replace (supplant) funds that have been appropriated for the same purpose.

### **Project Application Process**

The project funding application process is outlined below:

- Sub-recipients must complete a Preliminary Homeland Security Grant Program Project Funding Request (form available upon request), and present their project to the Urban Area Working Group (UAWG). The UAWG will recommend approval or denial to the Steering Committee.
- After project is presented to UAWG, Sub-Recipient completes the “Application for Project Funding” and submits it to the Anaheim/Santa Ana UASI Grant Office for review and approval.
- If applicable, sub-recipient completes the Environmental and Historic Preservation Screening Memo, Coversheet, and required back-up (maps, pictures, descriptions, etc.) and attaches to the Application for Project Funding (contact Grant Office for more information).

*Note:* Not all proposed projects will require an EHP. EHP determination can be made by reviewing the applicable Authorized Equipment List or FEMA’s EHP Policy Guidance #108-023-1 for training and exercises

([https://www.fema.gov/sites/default/files/documents/fema\\_GPD-EHP-policy-final-amendment\\_82018.pdf](https://www.fema.gov/sites/default/files/documents/fema_GPD-EHP-policy-final-amendment_82018.pdf)).

- The Grant Steering Committee will review the applications to determine projects approved for funding.

Sub-recipients that have their applications approved for funding will receive an “Award Letter” which will detail the amount of funding that has been approved.

### **Environmental and Historic Preservation Requirements**

At the time of the project application submission, or when directed by the ASAUA Grant Office based on the project scope, sub-recipients will be required to submit the Environmental and Historic Preservation (EHP) Screening Memo, and required back-up (maps, pictures, descriptions, etc). Refer to the attachments at the end of the screening form for assistance.

EHP is required for certain types of training and exercises. Please refer to FEMA’s EHP Policy Guidance (referenced above) for verification on when an EHP is necessary for training courses and exercise deliveries. For additional clarification on EHP’s, please refer to

<https://www.fema.gov/grants/guidance-tools/environmental-historic>

### **Notification of Award**

For those projects that are approved for FY21 UASI funding, the sub-recipient will receive an award letter indicating the project has been approved for funding, the amount of funding that has been approved, and the time frame in which the project must be completed.

### **Project Modifications**

Sub-recipients must complete the Request for Project Modification (contact grant office for form), and submit it to the Anaheim/Santa Ana UASI grant office for approval prior to modifying any of the terms of the project or funding amounts.

## **Part 4 – Reporting Requirements, Procurement, and Reimbursements**

### **Procurement**

Sub-recipients shall use their own procurement procedures and regulations, provided their procurement procedures and regulations conform to applicable Federal law and standards.

The sub-recipient must use the System Award Management (SAM) located at <http://sam.gov> to verify all parties involved in transactions that are expected to equal or exceed \$25,000 have not been debarred or suspended from receiving federal funds (2 CFR 180.220). Sub-recipients must comply with all applicable lobbying prohibitions and laws as required by U.S. Code Title 31 § 1352 and ensure language regarding this requirement is included in all agreements and contracts entered into by the sub-recipient. All contracts must also contain the applicable provisions identified in (2 CFR 200.326).

### **Selection of Procurement Method**

Sub-recipients should follow their own established procurement policies, provided their procurement methods conform to applicable Federal law and standards. These policies should detail the following procurement methods and when it is permissible to use them:

- **Micro-purchase** – Acquisition of supplies or services in which the aggregate dollar amount does not exceed \$10,000. Micro-purchases may be awarded without soliciting competitive quotations if the price is deemed reasonable.
- **Small purchase** – Must obtain price or rate quotations from an adequate number of qualified sources; procurement must be competitive.
- **Sealed bids** – Must make a firm fixed-price award to the bidder whose bid is the most advantageous to the grantee. If factors other than price are considered in determining the winning bid, the invitation for bids must describe clearly these other factors and how they will be applied in calculating the bids.
- **Competitive proposals** – Fixed-price or cost-reimbursement type contract. Must identify all evaluation factors and their relative importance, considering price and other factors.
- **Non-Competitive procurements** – Used only when the small purchase, sealed-bid or competitive proposals methods are not feasible, and one of the following circumstances exists:

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- The item is only available from one source
- There is a public exigency or emergency need for the item that will not permit the delay associated with competitive solicitation
- After solicitation of a number of sources, competition is determined inadequate.

Please see below for additional requirements pertaining to non-competitive procurements.

### **Reasonableness of Cost/Price**

Sub-recipients are required to perform some form of price or cost analysis cost with every procurement estimated to exceed the Simplified Acquisition Threshold (currently set at \$250,000). The method or degree of analysis is dependent on the facts and circumstances surrounding the particular procurement but, as a starting point, sub-recipients must make independent estimates before receiving bids or proposals. Through a cost analysis, determinations are made on which costs are real and reasonable, allowable under grantee regulations or rules, and properly allocated to the work to be performed under proposed contracts.

Sub-recipients are required to negotiate profit as a separate element of price for each contract where there is no price competition and in all cases where a cost analysis is performed. Please contact the ASUA Grant Office for guidance and recommended language for meeting this requirement.

### **Conflicts of Interest**

No official or employee of local government shall participate personally through decisions, approval, recommendation, or otherwise in any application, contract, award, agreement with federal funds, in which he/she or immediate family, partners, organization in which they participate or prospective employment, has a financial interest, or has less than an arms-length transaction. Violations may result in criminal, civil, or administrative penalties.

### **State EOC, Aviation, and Non-Competitive Procurement Pre-Approval Requirements**

For all UASI projects that establish or enhance an Emergency Operation Center (EOC), project managers must submit the CalOES Establish/Enhance Emergency Operations Center (EOC) Request Form (contact Grant Office for copy of form) to the Santa Ana UASI Grant Coordinator for pre-approval.

Any and all Aviation Equipment projects must also be pre-approved by CalOES before purchases begin. The CalOES Aviation Request Form (contact Grant Office for copy of form) once completed must be forwarded to the Santa Ana UASI Grant Coordinator.

Finally, all Non-Competitive Procurements in excess of the Simplified Acquisition Threshold (currently set at \$250,000) require pre-approval from CalOES, before any purchases are made. Once completed, the Request for Non-Competitive Procurement Authorization Form (contact the Grant Office for a copy of the form) must be forwarded to the Santa Ana UASI Grant Coordinator for approval. The form will require approval from the sub-recipient's Purchasing Agent before being submitted to CalOES for review. Further documentation supporting the procurement effort may be requested for review by CalOES.

### **Documentation**

Sub-recipients are required to maintain records sufficient to detail the history of procurement [2 CFR 200.318(i)]:

- The rationale for the method of procurement (small purchase, sealed bid, etc.)
- The selection of contract type (fixed-price, cost reimbursement, etc.)
- Contractor selection or rejection; and
- The basis of the contract price.

If procurement exceeds the small purchase amount, the sub-recipient must include in its procurement records and files:

- The basis for contractor selection
- Justification for lack of competition when competitive bids or offers were not obtained
- The basis for the award cost or price

Please keep a detailed record of each procurement step. A form is available to assist the sub-recipient with this process. Please contact the grant office for a copy.

### **Performance Bonds**

Sub-recipients are required to purchase performance bonds for any equipment items that exceed \$250,000 or for any vehicles including aircraft or watercraft that are financed with Homeland Security funds. The cost of the performance bond is an allowable expense under the UASI grant program. Per the HSGP California State Supplemental Guidance, equipment purchased under a performance bond must be received within 90 day of the Recipient's (City of Anaheim or City of Santa Ana) performance period.

\*\* A copy of the performance bond must be submitted to the awarding agency (CalOES) no later than the time of reimbursement.

### **Indirect Costs (Facilities and Administration)**

Under the FY21 UASI Grant Program, recipients and sub-recipients are allowed to claim indirect costs based on their federally approved indirect cost rate for expenses that are not easily tied to a specific object or activity (direct costs) and fall within the "Facilities" or "Administration" categories. Per 2 CFR Part 200.414, "Facilities" is defined as depreciation on buildings, equipment and capital improvement, interest on debt associated with certain buildings, and operations and maintenance expenses. "Administration" is defined as general administration and general expenses such as the director's office, accounting, personnel and all other types of expenditures not listed specifically under the "Facilities" sub-category. The indirect costs eligible for reimbursement under FY21 are based an approved percentage of the total claimed expenditures, excluding equipment and contract costs. A copy of the approved rate is required at the time of application, and must be provided to DHS/FEMA before indirect costs are charged to the award.

As part of the FY21 UASI Grant Application process, the Anaheim/Santa Ana UASI was required to notify CalOES as to whether or not they would be claiming indirect costs under the FY21 award. The Grant Office has elected not to claim "Facilities" and "Administration" costs under this grant cycle.

### Training Program Overview

The Anaheim/Santa Ana Urban Areas allocates training funds to applicable Orange County jurisdictions based on the following functional areas: Law Enforcement, Fire, Health Care, and Emergency Management.

Although no longer a DHS requirement, the Anaheim/Santa Ana UASI continues to dedicate 10% of the total grant allocation to eligible training expenses as set forth by the Urban Area Working Group (UAWG). The UAWG makes recommendations that will enhance regional preparedness, ensure standardization within Orange County, avoid duplication of efforts, and maximize the use of grant funds. Training needs will be determined by regional stakeholders within each functional area based on an evaluation of the region's gap in capabilities and the Urban Area's Multi-year Training and Exercise Plan. In collaboration with the UAWG, these needs will be prioritized and presented to the Anaheim/Santa Ana UASI for funding. A list of eligible training courses will be maintained in the ASUA Homeland Security Regional Homeland Security Training Catalog.

Additional courses may also be offered through local instruction based on identified need. Eligible costs for locally instructed training under the FY21 UASI allocation will be reimbursed through the Santa Ana UASI Office. Please refer to the training calendar on the Orange County Intelligence Assessment Center (OCIAC) website, <https://ociac.org>, for a list of the additional approved UASI training courses and deliveries.

### Regional Training

Attendance for regional training classes will be coordinated through the Anaheim/Santa Ana Training and Exercise Coordinator and the OCIAC website. Jurisdictions must adhere to the approval process under the Reimbursement Guidelines section below prior to attendance by personnel in a regional training class. Please note, for regional training courses provided locally, one tracking request number will be requested for all participating jurisdictions; contact the UASI Training and Exercise Coordinator for confirmation.

### Reimbursement Guidelines

Training expenses that are submitted for reimbursement must adhere to the FY21 State and Federal Homeland Security Grant Program Guides, and applicable Code of Federal Regulation (CFR). In accordance with this guidance, several regulations are highlighted below:

- Reimbursable training costs for approved training includes: Tuition, Overtime and Backfill for approved instructors, and Travel Costs (i.e. airfare, mileage, per diem, hotel, etc.). All expenses must comply with each jurisdiction's established policies.
- Overtime and backfill are reimbursable expenses, but at NO time is dual compensation (overtime and backfill) allowable during the same training day. In order to pay for backfill, agencies must have incurred the expense of paying overtime to fill a position vacated by the employee on the day of the training.
- Personnel costs for employees who provided training instruction on a normal work day

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are not reimbursable.

- For agencies that have extended shifts (12-24 hours) please note that backfill can only be reimbursed for the time that the employee was not able to work their normal shift due to the training.
- Reimbursement for “Fringe Benefits” in overtime and backfill is limited only to Federal Insurance Contributions Act (FICA), Workers’ Compensation, and Unemployment Insurance.
- Tips, alcohol, and entertainment are not reimbursable expenses.
- Agencies must retain expense related documentation for three years past the close of the grant by CalOES and the ASUA Grant Office.

To submit for reimbursement, sub-recipients will need to complete the Travel Reimbursement Application Worksheet for each completed course. The Travel Reimbursement Application Worksheet must include the State Tracking Number for the class in order to receive reimbursement.

Payroll documentation must include a timesheet, overtime sheet, or some other form of documentation that has the following information: employee signature, grant (UASI), date(s), hours, and purpose (ex. course title attended or Backfill for employee). If the sub-recipient does not have this document, the employee must complete the Functional Timesheet. All Overtime/Backfill expenses must be supported by copies of a payroll or other similar system that supports the overtime rate and number of overtime/backfill hours that submitted for reimbursement.

In addition to the Training Reimbursement Application Worksheet, sub-recipients must also complete one Reimbursement Request for Grant Expenditures form for the total amount listed on each of the Training Reimbursement Applications and Worksheets. An invoice must also be included that bills the City of Santa Ana for the total amount.

Please contact the grant office for a copy of all required forms.

### **Exercise Program Overview**

UASI Funded exercises will occur on an ongoing basis, according to the Urban Area’s Multi-year Training and Exercise Plan and identified capabilities gaps within the region. Certain exercises may have funding available for expenses incurred by jurisdictions as a result of participation in or the development of UASI funded exercises. All expenses to be reimbursed through UASI must receive prior approval from the Anaheim/Santa Ana UASI Grant Office. Any questions regarding the Exercise Program, please contact the Anaheim/Santa Ana UASI Training and Exercise Coordinator.

The following documentation is required for reimbursement:

#### **Equipment/Planning Reimbursement Documentation:**

- City/Agency invoice billing the City of Anaheim for reimbursable charges
- Reimbursement Request for Grant Expenditures Form
- Copies of invoices received and paid by Sub-Recipient
- Copies of payments (checks issued)

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- Copies of requisitions, quotes, and purchase orders
- Copies of Requests for Bid/Proposal, evaluations, and contracts
- Packing slip with itemized equipment purchases
- Equipment Reimbursement Worksheet

### Training Reimbursements Documentation:

- City/Agency invoice billing the City of Anaheim for reimbursable charges
- Reimbursement Request for Grant Expenditures Form
- 2021 Travel Reimbursement Worksheet
- Copies of invoices received and paid by Sub-Recipient
- Copies of payments (checks issued)
- Documentation of payroll records verifying hourly rate and overtime/backfill rate, as well as proof of total overtime cost paid for each employee
- Copies of signed employee documentation or UASI Functional Timesheets for overtime/backfill
- Copy of the Tracking Number
- Copy of roster showing proof of instruction
- Copies of all receipts for tuition, travel, lodging and per diem. If the sub-recipient's travel policy indicates actual costs will be reimbursed, the sub-recipient must submit all receipts. If the sub-recipient's travel policy is to provide a daily Per Diem, then records must be provided that document the amount of Per Diem provided.
- **DEADLINE to submit final training reimbursement packet: December 31, 2023.**

### Other Approved Personnel Cost (Planning, M&A, and Organization) Reimbursement:

- City/Agency invoice billing the City of Anaheim for reimbursable charges
- Reimbursement Request for Grant Expenditures
- Copies of employee job descriptions/duties related to the grant
- Copies of payroll records verifying hourly rate and overtime/backfill rate, as well as proof of total overall payroll costs
- Copies of signed employee payroll documentation or UASI Functional Timesheets for overtime/backfill or approved UASI salaries

### Deadline to Submit for Reimbursement

Sub-Recipients are encouraged to seek reimbursement throughout the grant cycle, as funds are expended. Final Reimbursement Packets (for all other projects outside of Training) are to be turned in NO LATER THAN **March 31, 2024.**

## **Part 5 – Financial and Equipment Monitoring Requirements**

### Monitoring Program Overview

In an effort to ensure the Anaheim/Santa Ana UASI is compliant with all federal, state and local laws and requirements, and to make certain all activities carried out under the Anaheim/Santa Ana UASI grant program are both reasonable and allowable, every sub-recipient who receives funding will be monitored by staff from the Anaheim/Santa Ana UASI

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grant offices. It is through a comprehensive application process and monitoring that the Anaheim/Santa Ana UASI hopes to achieve its goal of performing effective grants management.

### Procurements

Sub-recipients shall use their own procurement procedures and regulations, provided their procurement procedures and regulations conform to applicable Federal law and standards.

### Equipment

For purposes of this guide, “*Equipment*” is defined as follows: “An article of non-expendable, tangible personal property having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the governmental unit for financial statement purpose, or \$5,000.”

Refer to the DHS FY21 Homeland Security Grant Program – Notice of Funding Opportunity and the Authorized Equipment List (AEL) for allowable equipment expenses. The 21 allowable equipment categories for the FY21 HSGP are listed on the web-based AEL at: <https://www.fema.gov/authorized-equipment-list>. Unless otherwise stated in program guidance, equipment must meet all mandatory regulatory and/or DHS-adopted standards to be eligible for purchase using UASI funds. Sub-recipients will be responsible for obtaining and maintaining all necessary certifications and licenses for the purchased equipment.

### Physical Inventory

As noted above, the purpose of the monitoring visit whether formal or informal, is to oversee and ensure that sub-recipients are expending and using funds on projects that have been pre-approved. Furthermore, once the projects are completed, that the resulting equipment is being used in a manner consistent with the original intent and request.

To that end, and in compliance with federal, state, and local grant guidelines, strategies, and policies, a representative from the Anaheim/Santa Ana grant offices will be required to physically inspect, tag, and inventory all UASI funded equipment. The Anaheim/Santa Ana UASI grant offices will conduct a monitoring review of all Operational Area UASI funded equipment at least once every two years. Equipment items must be inspected and monitoring reviews completed throughout the life of the equipment, terminating when disposition takes place. Disposal records for equipment acquired with Federal funds must be retained for 3 years after final disposition. Please refer to the ASAUA Equipment Guidelines for a review of the applicable rules and regulations regarding the purchase and maintenance of federally funded equipment.

During a review, verification will be made that the following conditions do, or do not exist:

- There is a regional (operational area) application to the equipment.
- There is an established and documented Point of Contact/Custodian (POC) who is responsible for the providing all requested documentation to the monitor, as well as upkeep and care for the equipment.
- There is an established and documented process for inventorying equipment and tracking its use, maintenance, and training/exercising.
- Current and accurate equipment records are kept including: description, serial number, source of equipment, title holder, acquisition date, cost of equipment, percentage of

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federal participation in the cost, location kept, use of and condition of equipment, date of disposal (if applicable), and sale price (if applicable).

- Complete financial records are on hand, to include a full procurement/purchasing packet (quotes, bids, etc.), purchase orders and/or contracts, invoices, payments, packing slips, and any other documentation the sub-recipient deems necessary to show grant funds have been used according to the grant, administrative, and financial guidelines mentioned in Chapter 1 of this guide. Refer any financial recordkeeping questions to the Anaheim or Santa Ana Grant Fiscal Coordinator.
- Quality Control guidelines exist to ensure adequate safeguards to prevent loss, damage, or theft of equipment.
- If there is a case of loss, damage, or theft of equipment, the custodial agency must notify the Anaheim/Santa Ana UASI grant office in writing no later than 30 day calendar days. If lost, stolen, or damaged beyond repair, the equipment shall be replaced with that of like kind and capability, at the custodial agency's own expense.

The Sub-Recipient will be notified of any compliance issues (findings) discovered during the monitoring review. Advisory recommendations will be provided to ensure future compliance with grant regulations. Depending on the nature of the compliance issues identified, further action may be necessary and include penalties for the custodial agency. Penalties are not limited to, but may include: re-possession of the funded equipment by the Anaheim/Santa Ana UASI Grant Offices, future denial of project requests, etc.

### **Maintenance & Disposal**

The custodial agency will be responsible for all maintenance or repair related to UASI funded equipment, outside those covered by a manufacturer's warranty. When original or replacement equipment acquired under a grant or sub-grant is no longer needed for the intended use, or original project or program, disposition will be made as follows:

- Equipment with a current per-unit fair market value less than \$5,000 may be retained, sold, or otherwise disposed of with no further obligation to the awarding agency.
- Equipment with a current per-unit fair market value in excess of \$5,000 may be retained or sold, and the awarding agency (CalOES) shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.
- If not sold or retained, the equipment shall be returned to the Recipient (Anaheim/Santa Ana UASI grant office).
- Sub-Recipient **must** contact ASUA Grant Office prior to initiating disposition process. Grant Office is required to reach out to awarding agency for disposition instructions prior to taking any action.

Please refer to the ASUA Equipment Guidelines for a review of all applicable rules and regulations regarding the purchase and maintenance of federally funded equipment. Any questions regarding equipment and logistical monitoring, contact the UASI Grant Office.

## **Part 6 – Closeout Procedures**

### **Notification of Closeout**

The sub-recipient will receive notification of the closeout of FY21 UASI Grant Program once instructions have been issued by CalOES. The recipient (Anaheim/Santa Ana UASI) must submit the final Performance Report and Bi-Annual Strategy Implementation Report (BSIR) before approval and closeout will be issued. Once approved, CalOES will notify the Anaheim/Santa Ana UASI Grant Office of the start of the record retention period for all programmatic and financial grant-related records.

### **Record Retention**

Sub-recipients must retain all financial records and supporting documents for a period of three years from the date of submission of the final expenditure report by the Anaheim/Santa Ana UASI. Notification of the closeout date and subsequent record retention period will be disseminated by CalOES and passed through to the sub-recipient.

## **Part 7 – Conclusion and Timeline**

### **Conclusion**

It is critical that sub-recipients become familiar with the guidelines as set forth in this document, as well as the others referred to in this guide. With the overlap of grant cycles and nuances found within in each, the grant administrators and coordinators will rely on sub-recipients to provide timely, accurate information and documentation for a successful implementation of the UASI Grant Program.

### **FY21 UASI Grant Timeline**

Anaheim/Santa Ana UASI Performance Period Begins	September 1, 2021
Anaheim/Santa Ana UASI Award	April 29, 2022
Anaheim/Santa Ana Sub-Recipient Performance Period Begins	August 10, 2022
Anaheim/Santa Ana UASI Grant Program Rollout Meeting	August 10, 2022
Sub-Recipient Agreement & Eligibility Packet Due	November 18, 2022
Deadline to Submit Completed <u>Training</u> Reimbursement Packets	December 31, 2023
Final Reimbursement Packets Due/Performance Period Ends	March 31, 2024
Anaheim/Santa Ana UASI Grant Performance Period Ends	May 31, 2024