

FISCAL YEAR 2025

State Homeland Security Grant Program

Subrecipient Application Announcement

Sacramento County Operational Area

County of Sacramento, Office of Emergency Services

Adelina Ana · Homeland Security Grants Administrator

APPLICATIONS DUE

October 15, 2026

This announcement summarizes FY 2025 SHSGP requirements for Sacramento Operational Area subrecipients. It is a reference document — read it alongside the FY 2025 HSGP NOFO, the FEMA Preparedness Grants Manual, the FY 2025 California Supplement, and 2 C.F.R. Part 200.

Sac OES application requirements at a glance

1 Deadline

Narrative applications are due October 15, 2026.

2 Format

Applications must be submitted in Word. All fields must be completed.

3 No attachments

No additional documents are allowed as part of the application process.

4 Where to send it

Email your application to sacoa@sacounty.gov.

5 Confirmation

Notice of receipt will be sent within two business days.

6 Terrorism nexus

Every project must identify and explain how it is used to prevent terrorism.

Five funding categories

Agencies within the Sacramento Operational Area may submit projects under five categories: Planning · Organization · Equipment · Training · Exercise

- All equipment requests must reference authorized items from the FEMA Authorized Equipment List (AEL).
- Projects must align with California Homeland Security Strategy goals and map to an Investment Justification.
- **No expenditures are permitted before you receive an official grant award and/or subaward contract.**

FY 2025 SHSGP grant information

\$1,558,726

Award amount to
Sacramento County

September 1, 2025

FEMA period of
performance begins

December 31, 2027

Subrecipient period of
performance ends

What these numbers mean for you

- The award amount is the total SHSGP pass-through to the Sacramento Operational Area — not an amount available to any single agency.
- Requested amounts typically exceed available funding several times over, so many projects receive partial or no funding.
- Plan every project to be completed within the subrecipient period of performance.

Two period-of-performance dates

- Sac OES subrecipients must complete all activity and submit final reimbursement by December 31, 2027.
- Cal OES's own subrecipient period of performance runs to June 30, 2028, and its state award period ends August 31, 2028.
- The Sac OES date is the one that governs your project. Do not plan to the later state dates.

Supplanting: Grant funds may not be used to supplant existing local funding.

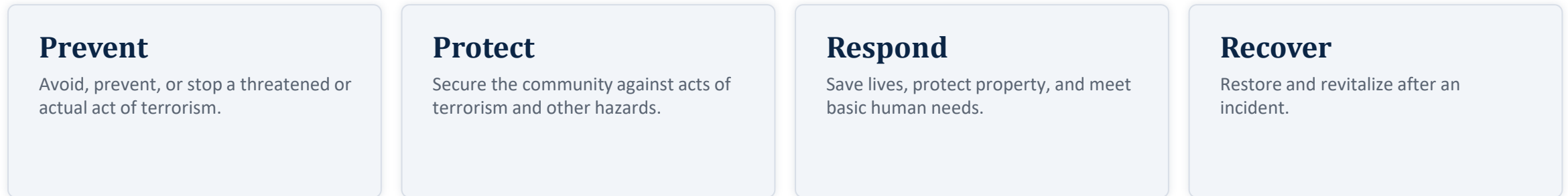
What SHSGP funds, and why

SHSGP assists state, tribal, and local preparedness activities that address high-priority preparedness gaps across all core capabilities where a nexus to terrorism exists.



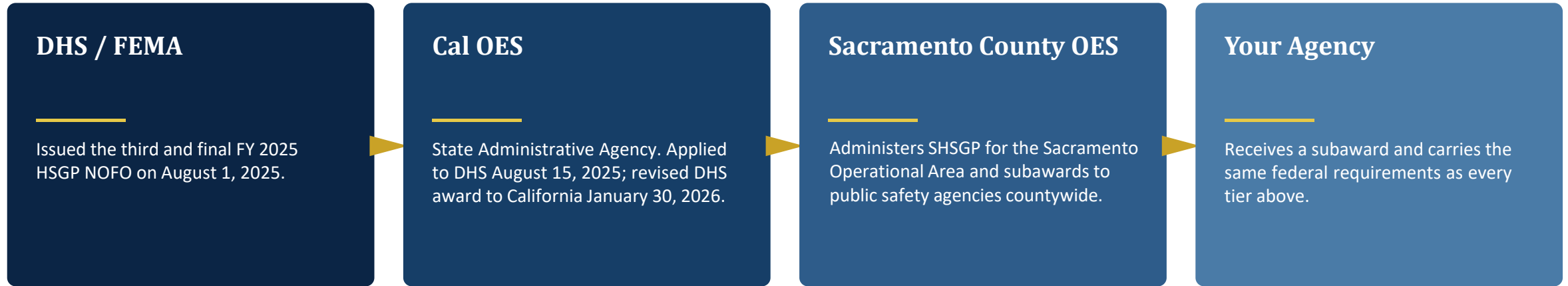
Together these five cost categories are commonly referred to as POETE.

Supports the mission areas of National Preparedness



Core capabilities: Applicants are encouraged to consider projects that meet the FEMA Core Capabilities within the National Preparedness Goal. There are 32 core capabilities across the five mission areas that help build and sustain agency capabilities and close identified gaps.

How FY 2025 SHSGP funds reach your agency



Requirements flow all the way down

- Subrecipients must follow the FY 2025 HSGP NOFO, the FEMA Preparedness Grants Manual, and 2 C.F.R. Part 200, State Supplement, in addition to the Sac OES requirements in this announcement.
- Debarment and suspension rules, procurement standards, and monitoring obligations apply equally to entities that receive funding passed through by a subrecipient.
- Where local procedures and federal standards conflict, the more stringent requirement must be followed.

The documents that govern your subaward

Sac OES Grant Award Document

Issued to your agency after the Approval Authority's funding decision. Must be signed and returned to Sac OES.

Sac OES Subrecipient Contract

The subaward agreement between your agency and Sacramento County OES. It carries the federal and state terms down to you.

FY 2025 HSGP NOFO

DHS/FEMA, third and final version issued August 1, 2025. Programmatic requirements and allowable investments.

FEMA Preparedness Grants Manual

Program-wide administration, allowable costs, and equipment guidance.

2 C.F.R. Part 200

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

FY 2025 California Supplement

Cal OES state policies layered on top of the federal NOFO, plus Information Bulletins and Grant Management Memoranda.

Critical: No expenditures are permitted prior to receipt of an official grant award and/or subaward contract. Costs incurred before that date are not reimbursable.

Key changes for FY 2025

1 Five National Priority Areas

Down from six in FY 2024. Two NPAs were added and three were removed.

2 New minimum spend requirements

Border Crisis Response and Enforcement: 10%.
Election Security: 3%.

3 Procurement thresholds raised

Micro-purchase \$15,000; simplified acquisition threshold \$350,000.

4 Payment review

All reimbursement requests will be reviewed and approved by Sac OES prior to payment disbursement.

5 Single-source training

Effective February 9, 2026, CSTI authorizes noncompetitive single-source training with the feedback number.

6 Drone procurement restriction

American Security Drone Act prohibition applies to all FEMA awards made on or after December 22, 2025.

Continuing requirements

- LETPA remains 35% of the total subaward.
- The Nationwide Cybersecurity Review (NCSR) must be completed, with certification provided to Sac OES.
- Build America, Buy America Act requirements continue to apply to infrastructure and construction projects.
- Federal tracking number requests now go through CSTI's online form; emailed PDF submissions are no longer accepted.

KEY DATES

FY 2025 SHSGP timeline for Sac OA subrecipients

August 1, 2025	DHS/FEMA release final FY 2025 HSGP NOFO	Complete
September 1, 2025	FEMA period of performance begins	Complete
May 2026	Cal OES releases FY 2025 California Supplement	Complete
October 15, 2026	Subrecipient applications due to Sac OES	APPLY BY THIS DATE
November 16, 2026	Screening Committee review — estimated	Estimated
December 14, 2026	Approval Authority review and final allocation decisions — estimated	Estimated
[Date TBD]	Signed grant award document due back to Sac OES	Estimated
[Date TBD]	Signed subrecipient contract due back to Sac OES	Estimated
December 31, 2027	Subrecipient period of performance ends; all activity complete	Upcoming

Estimated dates: Screening Committee and Approval Authority dates are estimates and may shift. Decision notification and award document due dates are set after the Approval Authority meets and will be confirmed by Sac OES. Build your project schedule around the October 15, 2026 application deadline and the December 31, 2027 performance period end date.

SECTION 1

Building Your Application

What Sac OES needs from you

- Narrative application requirements
- Application considerations before you write
- How to submit, and what happens next
- What the Approval Authority looks for
- Aligning your project to national and state priorities

Narrative application requirements

Sustaining or Building Capabilities

Identify, on a project-by-project basis, whether the project is sustaining a capability previously developed (with or without homeland security grant funding) or building a new capability.

Deployable and/or Shareable

Identify, on a project-by-project basis, whether the core capability the project supports is deployable and/or shareable.

Project Milestones

Identify, on a project-by-project basis, the milestones set to be achieved. Each reporting period, subrecipients must submit the last completed milestone for the project.

Terrorism Nexus

Identify and explain, on a project-by-project basis, how the project is used to prevent terrorism. Emphasis is on HOW the project addresses the terrorism threat in the area.

Reminder: All four elements must be addressed for every project in your narrative application. Incomplete narratives delay compliance review.

Application considerations

1 Terrorism nexus

Applications must have a terrorism nexus.

3 Regional need

Applications are selected based on regional needs across the Operational Area, not a single agency's priorities.

5 Total funding requested

State the total funding requested for the project, including any performance bond, shipping, or installation costs.

2 Core capability alignment

Applications must align with a FEMA Core Capability within the National Preparedness Goal.

4 Achievable timeframe

Projects must be completable within the subrecipient period of performance ending December 31, 2027.

6 Sustainability

Consider ongoing costs. Maintenance, warranties, and replacement beyond the grant are your agency's responsibility.

Be realistic: Requested amounts typically exceed available funding several times over. Scope your project so partial funding still produces a usable outcome.

Sac OES application process

Applications are due

**October 15, 2026, by
5:00 PM**

Late applications cannot be forwarded to the Screening Committee.

How to submit

- Narrative applications must be submitted in Word format.
- All fields must be completed. No additional documents will be allowed as part of the application process.
- Email applications to sacoa@saccounty.gov.
- Notice of receipt will be sent within two business days. If you do not receive one, follow up — do not assume delivery.

What a strong application does

- Explains in detail the need for the project and clearly identifies the terrorism nexus.
- States the capability being built or sustained, and the gap it closes.
- Lists the AEL number and title for every equipment item requested.
- Includes realistic milestones tied to the period of performance.
- Accounts for the full cost of the project, including any performance bond, installation, shipping, and required contract provisions.

Application review process

1	Sac OES compliance review	Initial review of every submission for completeness and compliance with federal, state, and program requirements.	Following the October 15, 2026 deadline
2	Screening Committee	An initial substantive review of applications, preparing recommendations for the Approval Authority.	November 16, 2026 (est.)
3	Approval Authority	Reviews applications and makes final allocation decisions for the Operational Area.	December 14, 2026 (est.)
4	Notification	Sac OES sends final funding decisions to applicants by email.	[Date TBD]

The Approval Authority is a five-member body: County Sheriff or designee · County Fire Chief or designee · Public Health Officer or designee responsible for EMS · Police Chief (selected by City Police Chiefs) · Municipal Fire Chief (selected by City Fire Chiefs)

What the Approval Authority looks for

Because requested amounts typically exceed available funding several times over, many projects receive partial or no funding. The Approval Authority prioritizes projects that:

1 Benefit the entire Operational Area

Regional value carries more weight than a benefit confined to one agency or jurisdiction.

2 Address operational necessities

Projects that meet a demonstrated operational need, not a discretionary upgrade.

3 Meet new or evolving standards

Projects responding to new or changing state and federal standards or mandates.

4 Build regional capability

Projects that close a capability gap identified across the Operational Area.

5 Offer sustainable solutions

Projects your agency can maintain and support after the grant period ends.

Before you write, ask yourself

- Would a reviewer outside my agency see why this matters regionally?
- Can I explain the terrorism nexus in plain language?
- If I got half of what I asked for, would the project still work?

Also remember: Grant funds may not be used to supplant existing local funding, and no expenditures are permitted before you receive an official grant award and/or subaward contract.

The five FY 2025 National Priority Areas

National Priority Area	DHS description	Minimum spend
Supporting Homeland Security Task Forces and Fusion Centers (NEW)	Promoting coordination of activities and critical information sharing and analysis to prevent and respond to threats	No minimum
Enhancing the protection of soft targets / crowded places	Improving security at locations accessible to the public and vulnerable to attacks	No minimum
Enhancing cybersecurity	Strengthening the protection of computer systems and networks against cyber threats	No minimum
Supporting Border Crisis Response and Enforcement (NEW)	Supporting collaboration between state and local law enforcement and ICE through the 287(g) program to identify and remove individuals who pose a threat to public safety and national security	10% minimum
Enhancing election security	Ensuring the integrity and security of voting systems	3% minimum

National Priority projects must be approved and deemed effective by DHS/FEMA before funds are obligated or expended.

Allocation requirements: 30% NPA and 35% LETPA

30%

Minimum of the SHSP award that must be spent across the five National Priority Areas.

13%

The only hard floors inside that 30%: 10% Border Crisis Response and Enforcement, plus 3% Election Security.

35%

Separate requirement: Law Enforcement Terrorism Prevention Activities, as a share of the total subaward.

How this affects your project

- The 30% NPA requirement and the 35% LETPA requirement are separate. LETPA may be met by funding projects in any combination of the five NPAs and any other investments — the two are not mutually exclusive.
- The remaining 17% inside the NPA requirement is flexible and can be allocated across any of the five NPAs.
- An activity listed in the authorizing legislation, or directly tied to a capability in the National Prevention Framework or a shared capability in the National Protection Framework, is presumed to have a law enforcement nexus and to be a LETPA. For all other activities, the nexus must be clearly explained.
- Modifications that change a National Priority project's scope or decrease its budget require DHS/FEMA approval.

Align your project to state strategy goals

California Homeland Security Strategy Goals

- Enhance Information Collection, Analysis, and Sharing
- Protect Critical Infrastructure, Soft Targets, and Crowded Places
- Strengthen Cyberspace Security and Preparedness
- Strengthen Communications Capabilities through Planning, Governance, Technology, and Equipment
- Enhance Medical and Public Health Preparedness and Capabilities
- Enhance Multi/Inter-Jurisdictional All Hazards / Whole of Community Incident Planning, Response, and Recovery
- Enhance Community Preparedness
- Enhance Homeland Security Evaluation, Training, and Exercise Programs
- Enhance Incident Recovery Capabilities
- Strengthen Food and Agricultural Outbreak and Contamination Preparedness

What FEMA verifies in every funded project

- Alignment with at least one core capability identified in the National Preparedness Goal
- How the investment builds capability, closes a capability gap, or sustains a capability identified through the THIRA/SPR process
- Whether the project supports a NIMS-typed resource, and whether those assets are deployable or shareable under existing EMAC agreements
- That the project is both feasible and effective at reducing the risk it was designed to address
- That the project can be fully completed within the period of performance

In practice: Name the strategy goal and the core capability directly in your narrative. Do not make the reviewer infer the alignment.

SECTION 2

Costs, Equipment & Compliance

What you can buy, and the rules attached

- Factors affecting the allowability of cost
- Equipment: authorized, controlled, and prohibited
- Telecommunications prohibitions and drones
- Supplanting and commingling of funds
- Policies every subrecipient is required to have

Factors affecting allowability of cost

Allowable

Listed on the AEL and authorized by law or regulation.

Allocable

Falls within POETE — planning, organization, equipment, training, and exercises — and within the scope of the grant.

Reasonable

Does not exceed what a prudent person would incur under the circumstances.

Necessary

Required for proper and efficient performance of the grant.

All four must be true — every time

- A cost that is allowable under the AEL can still be disallowed if it is unreasonable, outside the approved project scope, or unnecessary to performance of the grant.
- To be allowable, a cost must be adequately documented. If the file does not support it, it is not reimbursable.
- Costs must be consistent with the project as approved in your application and any subsequent Sac OES-approved modification.
- Costs incurred outside the period of performance, or before the award and subaward contract are in place, are not allowable.

Equipment requirements

Before you buy

- All equipment purchased with SHSGP funds must be on the FEMA Authorized Equipment List (AEL).
- Provide the AEL number and title on your application.
- Identify the capability associated with the equipment; use the FEMA Resource Typing Library Tool.
- You must have pre-approval before purchasing equipment.
- Check whether the AEL item triggers an Environmental and Historic Preservation (EHP) review. If it does, EHP must be approved before you buy.
- Confirm the item is not controlled equipment requiring DHS/FEMA authorization.

Generally not allowable

- Tracked armored vehicles
- Weapons, firearms, and ammunition
- Weapon accessories
- Camouflage uniforms or similar military-style apparel intended to replicate military use
- Maintenance or wear-and-tear costs for general use vehicles and emergency response apparatus
- Equipment purchased for permanent installation or use beyond the conclusion of an exercise
- Any other equipment not explicitly approved by DHS/FEMA

Tracking and tagging

- Each agency must have an internal equipment tracking system that meets federal requirements — property records showing description, serial/ID number, fund source, title, acquisition date, cost, federal share, location, use, condition, and disposition; a physical inventory at least every two years; and controls to prevent loss, damage, and theft.
- **Equipment must be tagged "2025 SHSGP" along with your agency equipment ID number for tracking.**

Prohibited telecommunications equipment and services

Effective August 13, 2020, section 889(f)(2)-(3) of the FY 2019 NDAA and 2 C.F.R. § 200.216 prohibit recipients, subrecipients, contractors, and subcontractors from using any FEMA funds under open or new awards for:

- | | | |
|----------|-------------------------------|---|
| 1 | Named manufacturers | Telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation, or any subsidiary or affiliate. |
| 2 | Video surveillance | For 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, or Dahua Technology Company, or any subsidiary or affiliate. |
| 3 | Services | Telecommunications or video surveillance services provided by such entities or using such equipment. |
| 4 | PRC-connected entities | Equipment or services produced or provided by an entity the Secretary of Defense, in consultation with the DNI or FBI Director, reasonably believes is owned or controlled by, or otherwise connected to, the People's Republic of China. |

This clause must be included in all FEMA-funded contracts and subcontracts, including purchase orders. Additional guidance: FEMA Policy #405-143-1 — [fema.gov/sites/default/files/documents/fema_policy-405-143-1-prohibition-covered-services-equipment-gpd.pdf](https://www.fema.gov/sites/default/files/documents/fema_policy-405-143-1-prohibition-covered-services-equipment-gpd.pdf)

Small Unmanned Aircraft Systems (sUAS)

What is permitted

- Under Executive Order 14305, Restoring American Airspace Sovereignty (June 6, 2025), and to the extent allowed by law, eligible agencies may purchase drones, or equipment and services for the detection, tracking, or identification of drones and drone signals, consistent with their legal authority.
- Subrecipients must comply with all applicable federal, state, and local laws and any statutory requirements on the use of federal funds.

What is prohibited

- The American Security Drone Act of 2023, enacted as part of the FY 2024 NDAA (Pub. L. No. 118-31), prohibits using federal award funds to procure or operate a covered UAS from covered foreign entities.
- **This prohibition applies to all FEMA awards made on or after December 22, 2025.**

Required forms and approvals before purchase

- FEMA Controlled Equipment Request Form
- Cal OES Controlled Equipment Self-Certification Form
- Cal OES Aviation and Aviation-Related Equipment Request
- Cal OES UAS (Drone) Request Form
- The Authorized Equipment Listing for 03OE-07-SUAS details the questions that must be included in the Aviation Request justification. Drone and UAS accessories follow the same process.
- FEMA approval is required before a UAS/sUAS can be purchased with SHSGP funds. Submit these through Sac OES.

Supplanting

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

What this means in practice

- Grant funds cannot be used for services or equipment already purchased, or already in your agency budget, to free up local dollars.
- You may be required to provide documentation certifying that any reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.
- Supplanting results in disallowance of the activity and repayment of the improperly used funds.

Questions that surface supplanting

- Was this item already in your adopted budget for this fiscal year?
- Would your agency have purchased this anyway if the grant did not exist?
- Is this replacing a position, service, or maintenance contract currently funded locally?
- If the answer to any of these is yes, discuss it with Sac OES before you apply.

Related: SHSGP funds may not be used to hire sworn public safety officers to fulfill traditional public safety duties, or to supplant traditional public safety positions and responsibilities (6 U.S.C. § 609(b)(1)(A)).

Commingling of grant funds

The requirement

- The accounting systems of all subrecipients must ensure that agency funds are not commingled with funds from other federal agencies.
- Each award must be accounted for separately.
- Subrecipients are prohibited from commingling funds on either a program-by-program or a project-by-project basis.
- Subrecipients are required to separate their grant funds.

Acceptable methods of separating funds

- Cost Center
- WBS Element
- Order Number
- Project Accounts
- Sub Accounts
- Project Code

Why it matters: Commingled funds make it impossible to demonstrate that a cost was charged to the correct award. This is a common audit finding and typically results in questioned costs across the entire project, not just the transaction at issue.

Policies every subrecipient must have

Records Retention 2 C.F.R. § 200.334

SHSGP documents must be maintained for at least three years from the date of the closeout letter.

Cash Management Procedures 2 C.F.R. § 200.302

Financial management systems that support accurate, current, and complete disclosure of grant activity.

Internal Controls 2 C.F.R. § 200.303

Reasonable assurance that the entity is managing the award in compliance with federal statutes, regulations, and award terms.

Purchasing Policies 2 C.F.R. §§ 200.317–200.327

Documented procurement procedures that align with the federal standards.

Assets and Inventory Management 2 C.F.R. § 200.313(d)

Procedures for managing equipment, including replacement equipment, until disposition takes place.

Written Plan to Charge Costs 2 C.F.R. § 200.403

A documented basis for how costs are charged to the grant.

Conflict of Interest 2 C.F.R. § 200.318

Written standards governing employees involved in the selection, award, and administration of contracts, including disciplinary provisions.

Monitoring note: Sac OES may request copies of these policies during monitoring. Have them current, adopted, and available before your first reimbursement request.

SECTION 3

Procurement & Contracting

Where most findings are written

- Procurement standards, methods, and FY 2025 thresholds
- Full and open competition
- Pre-qualified lists and cooperative purchasing
- Sole source and noncompetitive procurement
- Required federal contract provisions and debarment screening

Procurement standards

All procurement activity must be conducted in accordance with 2 C.F.R. §§ 200.318–200.327 and must adhere to applicable state and local laws.

- All procurement transactions must be conducted in a manner providing full and open competition (§ 200.319).
- The Uniform Guidance identifies five methods for procuring property and services under federal awards (§ 200.320); the method used must match the dollar value of the purchase.
- Avoid the acquisition of unnecessary or duplicative items.
- Agencies are encouraged to use federal excess and surplus property in lieu of purchasing new equipment where feasible.
- Award contracts only to responsible contractors with the ability to perform successfully under the terms and conditions of the procurement.
- Maintain records sufficient to detail the history of the procurement — including the rationale for the method, selection of contract type, contractor selection or rejection, and the basis for the contract price.
- Each contract must set a ceiling price that the contractor exceeds at its own risk.
- Verify that a contractor is not debarred or suspended using the Exclusions extract on SAM.gov. A printout is required as proof in order to make a claim.
- Implement written conflict of interest policies covering employees involved in selection, award, and administration of contracts.

The strictest-policy rule: Subrecipients must follow the strictest applicable policy. If the federal standard is stricter than your agency's procurement policy, apply the federal standard.

Procurement methods and FY 2025 thresholds

Up to \$15,000

Micro-purchase method

No competitive quotes required, but you must follow 2 C.F.R. § 200.320(a)(1)(ii). Documentation justifying the reasonableness of the price must be maintained for each transaction.

\$15,000 – \$350,000

Simplified acquisition

Multiple quotes required, or sole source documentation. A minimum of three price or rate quotations is encouraged.

Over \$350,000

Sealed bids or competitive proposals

Formal procurement procedures required. Noncompetitive proposals only with documented justification and prior approval.

Cal OES prior written approval

Required for any noncompetitive procurement exceeding \$250,000 — a lower threshold than the \$350,000 SAT.

Performance bond

Required for equipment, vehicles, aircraft, or watercraft exceeding \$350,000 paid in advance of delivery.

Full and open competition

All procurement transactions for the acquisition of property or services must be fully and openly competed, consistent with the standards of 2 C.F.R. Part 200.

Situations commonly considered restrictive of competition include, but are not limited to:

Unreasonable qualification requirements

Placing requirements on vendors that only one or a few could realistically meet.

Brand-name-only specifications

Specifying only a brand name product without allowing an equivalent.

Geographic preference

Imposing a local or in-state preference not authorized by federal statute.

Changes to federal procurement standards effective October 1, 2024

- Removes the prohibition on geographic preference for bids and proposals in certain circumstances, and encourages socioeconomic affirmative steps to use small businesses.
- Adds veteran-owned businesses as target firms, and encourages the use of recovered materials.
- Applies to FEMA awards with a federal award date or disaster declaration date on or after October 1, 2024.

Pre-qualified lists and cooperative purchasing

Use of pre-qualified lists

2 C.F.R. § 200.319(e)

A pre-qualified list is a tool to help streamline the solicitation process. Three conditions must be met:

- 1 The list must be current.
- 2 The list must include enough qualified sources.
- 3 The solicitor must not preclude potential bidders from qualifying during the solicitation period.

You must also publicly issue the solicitation.

Cooperative purchasing

Popular programs include CMAS, GSA, HGAC, OMNIA, and WSCA/NASPO.

- Using a cooperative agreement does not remove your obligation to comply with the federal procurement standards.
- You must document and explain how the agreement complies with 2 C.F.R. §§ 200.318–200.327.
- Full and open competition per § 200.319.
- Allowable procurement method per § 200.320.
- Keep the supporting documentation from the cooperative in your procurement file — Sac OES will ask for it at reimbursement and at monitoring.
- Must have FEMA contract provisions.

Common finding: Agencies frequently assume a cooperative contract is automatically compliant. It is not — the file must show that the cooperative itself was competitively established.

Sole source and noncompetitive procurement

Cal OES approval for sole source requests are required for

- Purchasing equipment from a vendor without procuring appropriate bids
- Any training deemed noncompetitive — for any amount
- Any noncompetitive procurement exceeding \$250,000
- Requires your agency Purchasing Agent's approval before the request goes to Cal OES

Submit sole source requests through Sac OES. Cal OES may request additional documentation supporting the procurement effort.

Your request must include

- A cost analysis demonstrating the costs are reasonable
- An explanation of why the item or service is available from only one source
- A description of how a public exigency or emergency will not permit a delay resulting from a competitive solicitation
- A description of your agency's solicitation process and sole source/noncompetitive procurement allowability

Training procurement — new process effective February 9, 2026

- CSTI authorizes the noncompetitive procurement of SHSGP-funded single source trainings concurrently with issuance of a feedback number. Once received, you may proceed and are not required to submit a separate noncompetitive procurement form.
- If CSTI determines the training does not meet single-source criteria, a feedback number is still issued — but the training must be procured competitively.

Required contract provisions — Appendix II to 2 C.F.R. Part 200

All contracts and purchase orders must contain the applicable provisions described in Appendix II to Part 200 (§ 200.327). FEMA does not recommend incorporating these provisions by reference.

Remedies for breach of contract (§ A)	Contracts greater than the federal SAT, currently \$250,000
Termination for cause and convenience (§ B)	Contracts greater than \$10,000
Davis-Bacon Act (§ D)	Construction contracts and subcontracts over \$2,000 — required for HSGP
Copeland "Anti-Kickback" Act (§ D)	Construction contracts and subcontracts over \$2,000 — required for HSGP
Contract Work Hours and Safety Standards Act (§ E)	Contracts over \$100,000 involving mechanics or laborers; verbatim language required
Rights to inventions made under a contract (§ F)	Applies where the award meets the definition of a funding agreement
Clean Air Act / Federal Water Pollution Control Act (§ G)	Contracts and subcontracts greater than \$150,000
Debarment and Suspension (§ H)	Contracts and subcontracts of \$25,000 or more
Byrd Anti-Lobbying Amendment (§ I)	Contracts and subcontracts of more than \$100,000 — clause and certification
Procurement of Recovered Materials (§ J)	State or political subdivision purchases over \$10,000 involving materials
Covered telecommunications prohibition (§ K)	All contracts and subcontracts, including purchase orders
Domestic Preferences for Procurements (§ L)	All contracts and purchase orders for work or products
Build America, Buy America Act (§ M)	Infrastructure projects under applicable awards issued on or after January 2, 2023

FEMA Contract Provisions Guide (v2, effective October 1, 2024): [fema.gov/sites/default/files/documents/fema_contract-provisions-guide_fy24.pdf](https://www.fema.gov/sites/default/files/documents/fema_contract-provisions-guide_fy24.pdf)

Debarred and suspended parties

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

What Sac OES requires

- Sac OES requires subrecipients to provide supporting documentation with reimbursement.
- Retrieve and print the required documentation from SAM.gov prior to contracting or purchasing — not after.
- A printout of the Exclusions extract is required as proof in order to make a claim.
- Verification is required for contracts of \$25,000 or more, contracts requiring federal agency consent, and contracts for federally required audit services.

Where to check

www.SAM.gov

System for Award Management — Suspension and Debarment verification
<https://sam.gov/content/home>

Notify Sac OES immediately in writing if you learn that any principal under your subaward falls under one or more of the four criteria at 2 C.F.R. § 180.335, and halt grant activity until you receive further instruction.

No printout, no payment: A reimbursement claim submitted without the SAM.gov documentation will be returned. Pull it before you issue the purchase order.

SECTION 4

After the Award

Managing your subaward to closeout

- EHP screening, construction, and renovation
- Training and exercise requirements
- Payments and modifications through Sac OES
- Quarterly reporting and the Nationwide Cybersecurity Review
- Monitoring, property management, and records retention

Environmental and Historic Preservation (EHP)

An EHP screening is needed for

- Purchase of equipment — check whether the AEL number triggers an EHP. If the equipment is mobile or portable, you do not need an EHP.
- Field-based training and exercises
- Renovations, upgrades, modifications, or physical security enhancements to existing structures
- Generator installation
- New construction or additions
- Communication towers, antennas, base radio and repeater projects, and related equipment
- Select HazMat equipment and any project involving ground disturbance

An EHP is not needed when

- The grant scope is limited to planning, management and administration, classroom-based training, tabletop and functional exercises, or the purchase of mobile and portable equipment where no installation is needed.

EHP Screening Form: caloes.ca.gov/wp-content/uploads/Grants/Documents/EHP-Screening-Form.pdf

FEMA EHP guidance: fema.gov/grants/guidance-tools/environmental-historic/preparation-resources

Start early — EHP reviews can take up to a year

No EHP-triggering activity — including site preparation, utility installation, groundbreaking, or equipment installation on an existing structure — may begin until the review is complete and DHS/FEMA has issued written approval. Submit EHP materials to Sac OES as early as possible. Construction using SHSP funds may not exceed \$1,000,000 or 15% of the subaward, and construction projects must comply with the Davis-Bacon Act.

Training, exercises, and planning projects

Training

- Explain in the narrative application the type of training, the capability, and the gap identified.
- All training classes require a Training Feedback Number from CSTI. Send the request through Sac OES.
- Requests go through CSTI's online form; emailed PDF submissions are no longer accepted.
- Submit at least 30 days before the training start date. Late requests risk the training being unallowable.
- Provide the total number of trainees.
- Include sole source procurement information if applicable.
- Field-based training requires an approved EHP before the training takes place.

Exercises

- Must be conducted in accordance with Homeland Security Exercise and Evaluation Program (HSEEP) manuals.
- The After-Action Report / Improvement Plan — or Exercise Summary Report for seminars and workshops — must be completed and submitted within 90 days after the exercise.
- Exercise costs will not be considered for reimbursement until the AAR/IP is received.
- HSEEP resources: fema.gov/hseep

Planning

- Any project under the Planning category must result in a tangible product — a written plan, an assessment, a training course developed with curriculum, brochures developed, and so on.
- Published materials must credit the awarding federal agency.
- Provide the final product for each planning activity.
- Include sole source procurement information if applicable.

Organization projects: Operational overtime costs require formal written pre-approval from DHS/FEMA. Submit requests through Sac OES well in advance of the activity.

Payments and modifications

SHSGP is a reimbursement grant. Your agency incurs the cost first and is reimbursed after Sac OES reviews and approves the claim.

Reimbursement requirements

- No expenditures are permitted prior to receipt of an official grant award and/or subaward contract.
- Submit reimbursement claims to Sac OES with full supporting documentation: invoices, proof of payment, procurement records, quotes or bid documentation, and the SAM.gov exclusions printout.
- Submit general ledger report and the Excel Workbook
- Provide a copy of all performance bonds prior to reimbursement.
- Costs must be allowable, allocable, reasonable, and necessary, and must match the project as approved.

Modifications

- Email Sac OES at least 60 days before the modification is needed.
- Submit your Excel workbook showing the modifications you are requesting, with written justification.
- Do not implement modification activities or incur associated expenses until you receive written approval.
- Substituting equipment, changing an AEL item, or moving funds between cost categories all require approval first.
- Modifications that change a National Priority project's scope or decrease its overall budget require DHS/FEMA approval and take substantially longer.

Plan ahead: Reimbursement and modification review both take time at multiple levels — Sac OES, Cal OES, and in some cases FEMA. Submit early, especially near the end of the performance period.

Subrecipient reporting requirements

Quarterly progress reports

- Subrecipients must submit quarterly progress reports to Sac OES for the life of the subaward.
- Each reporting period, report the last completed milestone for the project—the milestones you identified in your narrative application.
- Report expenditures to date, remaining balance, and any anticipated change to scope or schedule.
- **Reporting periods and due dates:** [Dates TBD — to be confirmed by Sac OES]

Nationwide Cybersecurity Review (NCSR)

- All recipients and subrecipients are required to complete the NCSR. It is an annual requirement for the life of the subaward.
- The NCSR is a no-cost, anonymous, annual self-assessment designed to measure the gaps and capabilities of state, local, tribal, and territorial government cybersecurity programs.
- Your NCSR certificate must be submitted to Sac OES once the review is completed.

Other reporting tied to reimbursement

- After-Action Report / Improvement Plan — due within 90 days of any grant-funded exercise. Exercise costs are not reimbursable until it is received.
- Final planning products — submit the tangible deliverable for every planning project.
- Equipment inventory — maintain current property records and conduct a physical inventory at least every two years.
- Failure to submit required reports is grounds for a hold on reimbursements and can affect future funding decisions.

Sac OES monitoring of subrecipients

Sac OES monitors each subrecipient at the end of every grant cycle year. Monitoring is normally conducted on-site; where an on-site visit is not possible, Sac OES will conduct a desk review instead.

What Sac OES reviews

- Source documentation supporting every expenditure claimed
- Eligibility of and support for expenditures, typically covering two to three years of data
- Actual activities compared to those approved in your application and any subsequent modification, including timesheets and invoices
- Procurement files and contracts, including competition documentation and required contract provisions
- Equipment lists, tagging, and physical inventories
- Required written policies — procurement, cash management, internal controls, conflict of interest, records retention
- Progress reports, milestone reporting, and NCSR certification

If you receive a finding

Findings require a Corrective Action Plan.

CAPs are expected to be addressed right away. Where a finding requires a longer process to resolve — adopting a new policy, for example — the CAP must be completed within one year.

Failure to submit a CAP as required results in a hold placed on any future reimbursements until the finding is resolved.

The best defense is the file. Build the documentation as you go — procurement records, SAM.gov printouts, quotes, invoices, proof of payment, inventory entries, and milestone updates. Reconstructing a file two years later, after staff turnover, is how avoidable findings happen.

Records retention and property management

Three years

All supporting documentation pertaining to the administrative, programmatic, procurement, and financial management of the grant must be retained for at least THREE YEARS following:

- the Cal OES letter closing out the federal/state grant award, and
- your agency's resolution of any monitoring or audit findings.

Property management and disposition

- Maintain property records showing description, serial/ID number, fund source, title, acquisition date, cost, federal share, location, use, condition, and ultimate disposition.
- Conduct a physical inventory at least every two years.
- Maintain a control system to prevent loss, damage, and theft, and adequate maintenance procedures.
- When equipment is no longer needed, determine its current fair market value and contact Sac OES for disposition instructions before selling or transferring it.
- If fair market value exceeds \$10,000, disposition instructions must be obtained from the awarding agency first.

Closed grants can still be audited. Failure to maintain records for the required retention period could result in a reduction of grant funds and an invoice to return costs associated with unsupported activities.

Single audit: Agencies expending \$1,000,000 or more in federal awards in a fiscal year are subject to the single audit requirement at 2 C.F.R. § 200.501. Track your total federal expenditures across all programs, not just SHSGP.

Things to think about before submitting a project

1 Can you prove the terrorism nexus?

If you cannot explain in plain language how the project prevents terrorism, the project will not compete well.

3 Is your procurement house in order?

Written procedures, conflict of interest policy, competition documentation, and SAM.gov checks must exist before you spend.

5 Have you budgeted the whole cost?

Performance bonds, shipping, installation, warranties, and contract provision compliance are all part of the real cost.

2 Can you finish by December 31, 2027?

Factor in EHP review — which can take up to a year — plus procurement lead time and vendor delivery.

4 Can you carry the cost until reimbursed?

This is a reimbursement grant with no advances.

6 Can you sustain it after the grant?

Maintenance, replacement, and recurring fees after the period of performance are your agency's responsibility.

Websites and reference links

Sacramento County OES	www.sacoes.org
FY 2025 HSGP NOFO	fema.gov/grants/preparedness/homeland-security/fy-25-nofo
FY 2025 California State Supplement	caloes.ca.gov/wp-content/uploads/Grants/Documents/FY2025-HSGP-State-Supplement.pdf
FY 2025 Preparedness Grants Manual	fema.gov/sites/default/files/documents/fema_gpd_preparedness-grants-manual_122025.pdf
Authorized Equipment List (AEL)	fema.gov/grants/guidance-tools/authorized-equipment-list
Excluded Parties (SAM.gov)	https://sam.gov/
FEMA Contract Provisions Guide	fema.gov/sites/default/files/documents/fema_contract-provisions-guide_fy24.pdf
2 C.F.R. Part 200 — Uniform Guidance	https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II
EHP Screening Form	https://www.caloes.ca.gov/wp-content/uploads/Grants/Documents/fema_ehp-screening_form_ff-207-fy-21-100_3-31-2026.pdf
FEMA EHP Guidance	https://www.fema.gov/grants/guidance-tools/environmental-historic
HSEEP / After-Action Reports	https://www.fema.gov/emergency-managers/national-preparedness/exercises/hseep
CSTI Request for Federal Tracking Number	https://app.smartsheet.com/b/form/0ce0f7906faa4de8b1e2e04b85967628
Cal OES Grant Management Memoranda	https://www.caloes.ca.gov/office-of-the-director/policy-administration/finance-administration/grants-management/homeland-security-emergency-management-programs/memos/
FEMA Information Bulletins	fema.gov/grants/preparedness/about/informational-bulletins
Telecom Prohibitions — FEMA Policy 405-143-1	fema.gov/sites/default/files/documents/fema_policy-405-143-1-prohibition-covered-services-equipment-gpd.pdf
Nationwide Cybersecurity Review (NCSR)	cisecurity.org/ms-isac/services/ncsr/

Additional program resources, including the FY 2025 subrecipient application, are posted on the Sacramento County OES SHSGP page at www.sacoes.org.

Questions?

Adelina Ana

Homeland Security Grants Administrator
County of Sacramento, Office of Emergency Services

916-874-2283

anaa@saccounty.gov

www.sacoes.org

Submit your application

October 15, 2026

- Word format only
- All fields completed
- No additional documents
- Email to sacoa@saccounty.gov