

Exhibit B

Draft of the Bay Area UASI Grant Policies and Procedures Manual



Bay Area Urban Areas Security Initiative (UASI) DRAFT

Grant and Project Policies and Procedures Manual

January 2012

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I. INTRODUCTION

A. Scope and Purpose

This manual provides the standards, policies, and processes that govern grant and project management and administration for the Bay Area UASI. Its purpose is to provide clarity and transparency around Bay Area UASI grant and project management, ensure efficiency and compliance in implementation, and ultimately to maximize the impact of federal funds to enhance the safety of Bay Area residents. This manual includes:

- Roles and responsibilities of the various entities participating in grant and project management;
- The lifecycle for Bay Area UASI projects, from identification through planning, execution, close out, and evaluation;
- Procurement process and financial administration; and
- Required templates and forms.

This manual is mandated by the Bay Area UASI Approval Authority Bylaws (July 2011 Section 8.8) and was approved by the Authority on August 18, 2011. In addition, the Department of Homeland Security requires documentation of grant management and administration in order to access funding from the Homeland Security Grant Program.

The Bay Area UASI General Manager will review and update this manual annually to ensure compliance with federal and state grant guidelines and to incorporate policies and procedures approved by the Approval Authority in the preceding year. The General Manager will present proposed changes to this manual to the Approval Authority for adoption.

B. Affected Parties

The standards, policies, and processes contained herein apply to all participants in the Bay Area UASI—the Approval Authority, Advisory Group, Management Team, Working Groups, Member Jurisdictions, Contractors, Affiliated Non-Employees, and other similar individuals.

C. Federal UASI Program Background

The Urban Areas Security Initiative (UASI) is administered at the federal level by the Department of Homeland Security through its Homeland Security Grant Program within the Federal Emergency Management Agency (FEMA). The Homeland Security Grant Program provides federal funding to help state and local agencies enhance their capabilities to prevent, deter, respond to, and recover from terrorist attacks, major disasters, and other emergencies. The Homeland Security Grant Program encompasses several interrelated federal grant programs, including UASI, that together fund a range of preparedness activities as well as management and administration costs.

Since its inception in 2003, the intent of the federal UASI program has been to enhance regional preparedness in major metropolitan areas in support of the National Preparedness Guidelines. The UASI grant program provides financial assistance to address the unique multi-discipline Planning, Organization, Equipment purchase, Training, and Exercise (POETE) needs of high-threat, high-density urban areas, and to assist these areas in building and sustaining capabilities to prevent, protect against, respond to, and recover from threats or acts of terrorism. Activities implemented with UASI funds must support terrorism preparedness, response, and recovery in order to be considered eligible. However, many capabilities which support terrorism preparedness simultaneously support preparedness for other hazards. Grantees must demonstrate the dual-use quality for any activities implemented that are not explicitly focused on terrorism preparedness.

Urban areas must use UASI funds to employ a regional approach to overall preparedness and 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, response, and recovery activities within the region.

D. Bay Area UASI Background

The Bay Area UASI improves capacity to prevent, protect against, respond to, and recover from terrorist incidents or related catastrophic events by providing planning, training, equipment and exercises to the Bay Area UASI region. It enhances regional capability through regional collaboration and responsibly leverages funding to achieve optimal results with the dollars available. The Bay Area UASI also coordinates and administers risk management planning and regional strategy, as well as researches, learns from, and shares what works well and what does not to inform program/product development.

The Bay Area UASI's footprint is comprised of three major cities (Oakland, San Francisco, and San Jose); twelve counties (Alameda, Contra Costa, Marin, Monterey, Napa, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Solano, and Sonoma); and more than 100

incorporated cities. The primary source of funds comes from the Homeland Security Grant Program (UASI program) administered by the Department of Homeland Security.

II. ROLES AND RESPONSIBILITIES

Governed by Memoranda of Understanding (MOUs) between participant jurisdictions, the Bay Area UASI is managed through a multi-layered governance structure. At the top level is the Approval Authority, which is supported by an Advisory Group. Working Groups provide subject matter expertise and help identify projects, and management and administration is handled by the Bay Area UASI Management Team. Project Leads are responsible for all aspects of project planning and management, and sub-recipient jurisdictions are key project team members and implement procurement processes.

A selected Urban Area shall establish an Urban Area Working Group (UAWG), which must provide direct or indirect representation for all the jurisdictions and response disciplines (including law enforcement) that comprises the defined Urban Area; local MMRS leadership and Citizen Corps Council representatives; and officials responsible for the administration of CDC and ASPR cooperative agreements. The Bay Area UASI Urban Area Working Group is called the Approval Authority.

A. Approval Authority

Participants

The top tier of governance in the Bay Area UASI is the eleven-member Approval Authority (or “Authority”) that includes representation from each of the three major cities of Oakland, San Francisco, and San Jose and each of the counties in which they are located (Alameda, San Francisco, and Santa Clara) in addition to the counties of , Contra Costa, Marin, Monterey, San Mateo, Santa Clara and Sonoma). The California Emergency Management Agency (Cal EMA) Deputy Director for Operations is a non-voting member.

Responsibilities

The Approval Authority provides policy direction and is responsible for final decisions regarding projects and funding. The role of the Authority in grant and project management includes:

- ***Regional Coordination and Strategy*** – Coordinating a regional approach to prevention, protection, response and recovery to homeland security threats as well as approving the Bay Area Homeland Security Strategy.
- ***Risk Management*** – Adopting a regional risk management framework to administer the UASI Homeland Security Grant Program and related grants, consistent with grant

guidelines and direction provided by the Department of Homeland Security and the California Emergency Management Agency (Cal EMA).

- ***Grant Approval*** – Approving UASI program and related grant applications, grant allocation methodologies, and the allocation and distribution of grant funds.
- ***Management Team Budget*** – Approving the annual budget for the Bay Area UASI Management Team, based on a July 1 – June 30 fiscal year.
- ***Advisory and Working Groups*** – Approving the establishment, purpose, and membership of any advisory bodies whose purpose is to advise the Approval Authority, as well as providing personnel with subject matter expertise to participate in such groups.
- ***Participation in Implementation*** – Participating in the implementation of regional initiatives that are consistent with the mission and decisions of the Approval Authority, including participation in the risk assessment process on an annual basis.

Meetings

Approval Authority meetings take place monthly. See the July 2011 Approval Authority Bylaws and Memoranda of Understanding (MOU) for more information.

B. Advisory Group

Participants

The second tier of governance of the Bay Area UASI is the Advisory Group. Advisory Group membership includes one representative each from the ten Bay Area county operational areas, the three major cities, the Northern California Regional Intelligence Center (NCRIC)/ Fusion Center, as well as the Coastal Regional Administrator for the California Emergency Management Agency (Cal EMA). The Advisory Group has both a Chair and a Vice-Chair that are selected from among the membership.

County/city administrators identify Advisory Group members on an annual basis. Members should be senior staff with appropriate subject matter expertise and decision-making authority who can provide a regional strategic perspective. Advisory Group members must have adequate time availability to carry out their responsibilities and must identify an alternate to attend meetings and perform functions for them when they are not available.

Responsibilities

- The Advisory Group supports the UASI Approval Authority in making decisions, gathering information, analyzing information, having dialogue, and making policy and programmatic recommendations. Consistent with grant program requirements, the Advisory Group reviews, analyzes, discusses, and makes recommendations to the Approval Authority on:
 - The Bay Area Homeland Security Strategy;
 - Project identification process, including the risk and capability assessment;
 - UASI program and related grant applications; and
 - Allocation and distribution of grant funds under the jurisdiction of the Approval Authority, including a recommended list of proposals and amounts of funding for each.

The Advisory Group provides recommendations to the Bay Area UASI Management Team for subject matter expert participants in the Working Groups, receives updates from Management Team and Working Group representatives on their work, contributes technical input to the risk assessment process, and provides input on sub-recipient jurisdiction selection. An Advisory Group member or a Management Team Member also serves as Chair for each Working Group.

Meetings

Advisory Group meetings take place monthly in advance of Approval Authority meetings and are facilitated by an elected Chairperson of the Advisory Group. Advisory Group members or their alternates are required to be prepared for and attend all meetings. If a member or designated alternate misses more than two meetings, the Advisory Group must take a majority vote on whether or not to remove that member, and if the member is removed, the Bay Area UASI General Manager will request another representative from that jurisdiction.

C. Management Team

Participants

The Bay Area UASI Management Team is comprised of a general manager, strategy and compliance director, chief financial officer, as well as program/project, finance and grant, and administrative staff. The General Manager appoints members to the Management Team to implement the policies of the Approval Authority. The members of this Team are employees of the member jurisdictions of the Approval Authority, are assigned to work full-time on the Management Team, and are paid salaries through grant funds.

The General Manager directs and manages the Management Team, including setting job duties and responsibilities and establishing performance goals and expectations. General office,

staffing, and personnel policies and procedures for the Management Team staff will be documented in a manual issued in the spring of 2012.

Responsibilities

The Bay Area UASI Management Team is responsible for the administration and management of the projects that have been endorsed by the Approval Authority and all other administrative and legislative responsibilities associated with running the UASI. This includes regional capability assessment, planning and strategy development, resource allocation, implementation, and evaluation of the Bay Area UASI program. In addition, the team is responsible for the liaison role between the City and County of San Francisco, which serves as the fiscal agent for grant funds, and the grantors and sub-recipients. The Management Team also serves as the point of contact for all inquiries and issues from regional stakeholders and facilitates Approval Authority, Advisory Group, Work Groups, and other stakeholder meetings.

The Management Team is comprised of two units, Project Management and Grants Management.

The Project Management Unit is responsible for:

- ***Needs Identification*** – Working with any advisory and working groups, as well as appropriate Bay Area stakeholders, to obtain input and make recommendations to the Approval Authority on application for and allocation and distribution of grant funds and policy and programmatic objectives.
- ***Coordination and Collaboration*** – Coordinating and managing advisory and working groups, including serving as the liaison between those groups to ensure regional coordination and collaboration.
- ***Grants Administration*** – Overseeing and executing all administrative tasks associated with application for and distribution of grant funds and programs, including maintaining records, negotiating deliverables and timelines for projects, and creating agreements outlining contract amounts and terms.
- ***Project Management*** – Providing regional coordination, monitoring, management, and oversight of grant-funded projects and programs.

The Grants Management Unit is responsible for:

- ***Grants Administration*** – Administering federal grant awards to ensure compliance with federal laws, regulations, executive orders, OMB circulars, departmental policy, award terms and conditions, and state and local requirements.
- ***Procurement*** – Developing contracts for projects and reviewing and approving contract procurement for sub-recipient projects.

- **Accounting** – Reconciling financial records, responding to internal and external audits, reimbursement of sub-recipients, processing of cash requests, and ensuring all activities carried out under the Bay Area UASI grant program are reasonable and allowable.
- **Sub-recipient Partnerships** – Helping prepare and modify agreements between the Bay Area UASI and sub-recipients as well as monitoring sub-recipients to ensure compliance with grant requirements.

D. Working Groups

Participants

Bay Area UASI Working Groups are comprised of regional stakeholders who are subject matter experts. The Bay Area UASI General Manager is empowered by the Approval Authority to create discipline-specific and/or functionally-determined work groups to make assessments and recommendations that address risk reduction, sustain mission critical initiatives, and enhance capabilities on a regional basis.

Members of the Approval Authority are required to provide personnel with subject matter expertise to participate in Working Groups. The General Manager may also solicit subject matter experts to include representatives from member counties and cities. In addition, members of the Approval Authority and the Advisory Group are encouraged to identify participants with relevant subject matter expertise from outside government, including non-governmental and community-based organizations, who can participate in Working Groups.

Responsibilities

The primary objective of the Working Groups is to provide a venue for subject matter experts to assess regional capabilities based on risk, as well as solicit, review, and make recommendations concerning homeland security grant projects to the Advisory Group. All Working Groups are project-focused and do not set policy. The role of the Working Groups includes:

- **Risk Assessment** – Performing risk and capability assessments and reviewing regional strategy for risk and threat information.
- **Project Identification** – Developing proposals based on gap analyses and soliciting and gathering proposal information from each jurisdiction.
- **Proposal Review** – Reviewing and analyzing proposals and ensuring that they are aligned with state priorities and the National Preparedness Guidelines.
- **Proposal Scoring** – Developing criteria for the project proposal scoring process, rank-ordering proposals based on these criteria, and providing this list to the Advisory Group.

- ***Project Team Membership*** – Providing recommendations on the assignment of sub-recipient jurisdictions.
- ***Project Implementation Oversight*** – Providing technical oversight during project implementation.
- ***Evaluation*** – Documenting and applying lessons learned from project implementation as well as providing input for portfolio evaluation and performance metrics.

Currently, there are four Working Groups in the following areas, which are consistent with the Bay Area Homeland Security Strategy goals:

- Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE)/Training and Exercises;
- Information Analysis and Infrastructure Protection;
- Interoperable Communications; and
- Risk Management.

Meetings

Working Groups meet at least monthly. Members must be prepared for and attend all meetings, and could be disqualified by the Bay Area UASI General Manager from future participation if two meetings are missed. The General Manager will request the Approval Authority and Advisory Group to identify new personnel for Working Group participation if previously identified individuals are unable to regularly attend meetings or are otherwise unable to meet the responsibilities of the group.

Working Group Leadership

For each Working Group, the Bay Area UASI General Manager requests a Management Team Member to be the Chair. A Co-Chair will be a person selected from within the group by the group.

The Bay Area UASI Management Team coordinates and manages the Working Groups. Each Working Group is supported by a program/project manager from the Bay Area UASI Management Team. The Program/Project Manager is a subject matter expert, participates in all meetings, ensures the Working Group has needed information on a timely basis to meet their responsibilities, and is responsible for contributing to regular reporting to the Advisory Group. In addition, the Program/Project Manager is required to work cooperatively, constructively, and efficiently with Working Group Co-Chairs and members to accomplish these tasks:

- Setting meeting times on a regular schedule;
- Ensuring that the Working Group has a core mission statement and identified projects;

- Setting relevant agendas and objectives;
- Maintaining documents and records;
- Providing technical assistance to ensure projects are consistent with local, state, and federal guidelines; and
- Identifying and inviting participation and input from non-governmental and community-based representatives that can provide subject matter expertise.

E. Project Lead

Participants

The Project Lead may be either a jurisdiction or a staff member of the Bay Area UASI Management Team, typically a program/project manager with relevant subject matter technical expertise.

If a staff member, the Bay Area UASI General Manager or designee will appoint a Project Lead based on subject matter and project management expertise as well as availability.

Responsibilities

The Project Lead is the single point of contact for a project; is responsible for all aspects of project planning, execution, and close out; and coordinates with the Grants Management Unit to fulfill all required financial management and procurement processes.

The Project Lead works closely with technical experts in participating jurisdictions who contribute substantially to all phases of project management. The Project Lead also works closely with sub-recipients and helps ensure and support timely procurement and compliance. The Project Lead must participate actively in the associated technical Working Group, which provides technical oversight to the project, and will often also play the role as liaison for that Working Group to the Bay Area UASI Management Team.

The Bay Area UASI General Manager or designee is responsible for providing oversight and quality assurance to the work of the Project Lead. The standards laid out in this manual on grants and project management will form the basis for performance coaching and feedback for the Project Lead.

Jurisdiction– Project Lead (Executive Sponsor)

Pursuant to the Approval Authority Bylaws (July 2011 Section 8.5), the Bay Area UASI General Manager conducts any selection process required by grant guidelines to identify an “executive sponsor” for funded initiatives, unless otherwise designated in the award. The term “executive sponsor” refers to a sub-recipient jurisdiction that commits to implementing required procurement processes of a project and fulfilling all the requirements of a sub-grant award (see

Sections IV and V of this manual on financial management and procurement). Criteria used by the General Manager when making this selection includes:

- Availability and willingness of the proposed jurisdiction to play this role.
- Relevant subject matter expertise of the proposed jurisdictional representatives.
- Jurisdiction's proven track record of timely procurement and effective financial management of initiatives of similar scope and scale in the recent past and according to the standards laid out in Sections IV and V of this manual on procurement and financial management.
- Active membership of the proposed jurisdiction representatives in the relevant technical Working Group. Input from the relevant Working Group and Advisory Group on the proposed selection.
- Jurisdiction submits a regional project to the work group for review and evaluation or volunteers to take the lead on a regional project, e.g., the Metrics Project, as the person responsible is a subject matter expert.
- Work Group recommends the regional project to the Advisory Group for approval.
- Advisory Group prioritizes and recommends the regional project to the Approval Authority for approval.
- Approval Authority approves the regional project for inclusion in the grant application for the next grant cycle.
- With the approval of the grant award from FEMA, the Management Team will include the regional project in an MOU agreement with the jurisdiction.

The General Manager identifies the proposed jurisdiction to the Approval Authority for approval. The Bay Area UASI General Manager may at any time recommend to the Approval Authority the revocation of the role of sub-recipient jurisdiction due to a lack of adherence to policies and procedures laid out in this manual. If there are no jurisdictions that meet the criteria above, the General Manager will make this determination and recommend that project funds and procurement be directly managed by the Bay Area UASI Management Team.

Jurisdiction as Project Lead (Executor Sponsor) – Request for Proposal

A jurisdiction may become a Project Lead (executor sponsor) if there is a regional project such as the Regional Training and Exercise Project, through a Request for Proposal (RFP) process, which includes the following:

- a. The Regional Training and Exercise Work Group develops the scope of services for the RFP, evaluates the proposals, and recommends a jurisdiction to be the project lead.
- b. The Management Team facilitates the procurement process (posts the RFP, solicits proposals, facilitates the evaluation process, conducts negotiations and contract development, and executes an MOU).
- c. The Regional Training and Exercise Work Group recommends the proposed project lead to the Advisory Group for approval.

- d. The Advisory Group recommends the proposed project lead to the Approval Authority for approval.
- e. The Approval Authority approves the project lead for the regional project and directs the Management Team to initiate contract development.

F. Sub-recipients

Participants

Sub-recipients are jurisdictions that receive grant funds from the sub-grantee.

Responsibilities

Sub-recipient jurisdictions are responsible for adhering to the project management, procurement, and financial management policies and procedures outlined in this manual. Among other things, responsibilities include:

- Active participation as a project team member;
- Helping to draft, approving, and following MOU/LOAs (Memoranda of Understanding/ Letters of Agreement)– the Bay Area UASI will not disburse grant funds to a sub-recipient until and unless such an agreement is finalized;
- Ensuring financial management systems are in place;
- Requesting modifications when necessary;
- Requesting reimbursements in a timely manner;
- Comply with the Fiscal Agent’s Grants Management Policies and Procedures;
- Conducting sub-recipient monitoring, if applicable;
- Complying with performance milestones and completing projects within the grant performance period;
- Submitting quarterly reports to the Bay Area UASI Management Team documenting project progress; and
- Participating in risk and capabilities assessments and Bay Area Homeland Security Strategy updates, and attending work group meetings.

G. Ethical and Conflicts of Interest Standards

Ethical Standards

All members of the Bay Area UASI are required at all times to carry out their roles and responsibilities according to the highest ethical, professional, and quality standards. This includes conduct which is professional and competent, is cooperative with partners and stakeholders, and avoids bringing the Bay Area UASI into disrepute or negatively reflecting upon it. Members are bound by all of the rules, procedures, and specific requirements related to ethical and professional behaviors that are promulgated by their respective jurisdictions.

In addition, all Bay Area UASI members and sub-recipients understand and agree that federal funds will not be used, directly or indirectly, to support the enactment, repeal, modification or adoption of any law, regulation, or policy, at any level of government, without the express prior written approval from FEMA. They will comply with provisions of the Hatch Act (5 U.S.C. Sections 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with federal funds.

Conflicts of Interest

No member of the Bay Area UASI may use their position for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain for themselves or others, particularly those with whom they have family, business, or other ties. Personnel and other officials connected with Bay Area UASI funded programs must adhere to the following federal standards for avoiding conflict of interest in grants management and administration. Violations of conflict of interest standards may result in criminal, civil, or administrative penalties.

No official or employee of a state or unit of local government or a non-governmental recipient/sub-recipient shall participate personally through decisions, approval, disapproval, recommendation, the rendering of advice, investigation, or otherwise in any proceeding, application, request for a ruling or other determination, contract, award, cooperative agreement, claim, controversy, or other particular matter in which award funds (including program income or other funds generated by federally funded activities) are used, where to his/her knowledge, he/she or his/her immediate family, partners, organization other than a public agency in which he/she is serving as an officer, director, trustee, partner, or employee, or any person or organization with whom he/she is negotiating or has any arrangement concerning prospective employment, has a financial interest, or has less than an arms-length transaction.

In the use of Bay Area UASI funds, all officials, employees, and sub-recipients must avoid any action that might result in, or create the appearance of:

- Using his or her official position for private gain;
- Giving preferential treatment to any person;

- Losing complete independence or impartiality;
- Making an official decision outside official channels; and
- Affecting adversely the confidence of the public in the integrity of the government or the program.

Where a recipient of federal funds makes sub-awards under any competitive process and an actual conflict or an appearance of a conflict of interest exists, the person for whom the actual or apparent conflict of interest exists should recuse himself or herself not only from reviewing the application for which the conflict exists, but also from the evaluation of all competing applications. As detailed in Section III of this manual (see “Approval of Solicitations and Contracts” under “C. Planning”), participants in RFP screening and evaluation processes for Bay Area UASI projects will be required to sign and adhere to impartiality/confidentiality statements.

The Approval Authority’s conflict of interest procedure is detailed in the Memorandum of Understanding (July 2011 Section 20):

If and when a Party identifies an actual or potential conflict of interest among one or more of the Parties, that Party shall send written notification to all Parties. The Party with the actual or potential conflict shall respond to the notice within three business days. The response shall indicate whether the Party agrees or disagrees that a conflict exists. If the Party agrees, that Party may take appropriate action to cure the conflict, if possible, and shall describe its corrective actions in its response. If a Party disagrees, or cannot cure an actual conflict, the Approval Authority shall meet on the conflict within not less than 30 calendar days of the initial notice, in an effort to resolve the conflict. The Approval Authority shall schedule a special meeting if necessary to meet this timeline.

H. Summary Matrix – Grant and Project Roles and Responsibilities

<i>Steps in Project Cycle</i>	Approval Authority	Advisory Group	Management Team	Working Group	Project Lead	Sub-recipient Jurisdiction
Identification						
Risk Assessment	Inform	Inform	Coordinate and approve	Implement	--	--
Homeland Security Strategy	Approve	Inform	Coordinate and implement	Inform	--	--
Allocation and Policy Priorities	Approve	Recommend	Inform	Inform	--	--
Proposals and Scoring	--	--	Coordinate and approve	Implement	--	--
Project Approval	Approve	Recommend	Coordinate	--	--	--
Grant Applications	Approve	Recommend	Coordinate and implement	--	--	--
Planning						
Project Lead Assignment	--	--	Implement	--	--	--
Sub-recipient Assignment	Approve	Inform	Recommend	Inform	--	Inform
MOU/LOA	--	--	Implement and approve	--	Coordinate	Inform
Project Plan	Approve (over \$250K)/notified	Recommend (over \$250K)/notified	Approve	Inform	Implement	Inform
Solicitations and Contracts	Approve (over \$250K)/notified	Recommend (over \$250K)/notified	Approve	Inform	Coordinate/ implement	Implement
Execution						
Reporting	Notified	Notified	Implement	Notified	Implement	Inform
Timeline and Scope Change	Notified (over \$250K)	Notified (over \$250K)	Approve	Inform	Implement	Inform
Budget Change	Approve (over \$250K)/notified	Recommend (over \$250K)/notified	Approve	Inform	Implement	Inform
Deliverable Quality	--	--	Approve	Inform	Implement	Inform
Close out						
Administrative Close Out	--	--	Approve	--	Implement	Inform/ implement
Lessons Learned	--	--	Approve	Inform	Implement	Inform
Portfolio Evaluation, Metrics	Notified	Notified	Coordinate and implement	Inform	Inform	Inform

III. PROJECT CYCLE

The term “project cycle” includes the standard phases of the project management lifecycle which are: identification, planning, execution, and closure. The Project Management Unit of the Bay Area UASI Management Team is responsible for providing regional coordination, monitoring, management, and oversight of grant-funded projects. Projects are identified through a risk assessment and scoring process executed primarily by the technical Working Groups. The Management Team Project Lead is responsible for all aspects of the project planning phase, with significant support from partner jurisdictions and subject matter experts. In execution, the Project Team carries out the project as defined in documented plans and agreements. Finally, in close out, lessons learned are documented and evaluation data is gathered.

A. Definition of Terms

Project – A project is a temporary endeavor undertaken to create a unique product, service or result. It has a defined beginning and end and is usually constrained by time and funding. In the Bay Area UASI context, projects are funded by sub-grant awards approved by the Approval Authority. Projects vary considerably in size and complexity, range in amounts from hundreds of thousands to millions of dollars, and can include multiple sub-recipient jurisdictions. Each project has a high threat, high density urban area terrorism focus, is regional in nature, and is associated with an investment justification that is approved at the state and federal level.

Project Management – Project management is the discipline of planning, organizing, securing, and managing resources to achieve the specific goals of a project. In the Bay Area UASI context, the Bay Area UASI Management Team (Project Management Unit) is responsible for project management under the direction of the Approval Authority. Project Leads are responsible for coordinating all aspects of project management, working closely with technical experts from partner jurisdictions.

Grants Management – Grants management is the management and administration of grants. In the Bay Area UASI context, this refers to grants from the federal governments which are then awarded to sub-recipients. Because projects are funded by sub-grant awards, the terms “grants management” and “project management” can often be used interchangeably. Typically, however, the term grants management is used to refer to the compliance, procurement, and financial management elements of federal sub-award funding. The Grants Management Unit of the Management Team has responsibility for Bay Area UASI grants management.

Project Cycle – The term “project cycle” includes the standard phases of the project management lifecycle which are identification (sometimes called initiation), planning, execution (sometimes called implementation), and closure.

Project Identification – Project identification is the process by which project scope, goals, budget, timeline, and deliverables are defined at a high level, vetted, and confirmed to go forward by the appropriate authorities. In the Bay Area UASI context, projects are identified through a risk assessment and scoring process executed primarily by the technical Working Groups with support from the Management Team. Projects are then vetted and approved by the Advisory Group and the Approval Authority, respectively, and the project identification process culminates in the Homeland Security Grant Program application.

Risk and Capability Assessment – A risk and capability assessment process begins with an understanding of threats, their consequences, and vulnerabilities, and assigning a value to them. This is then paired with an assessment of regional capabilities, such as readiness to accomplish a mission, function, or objective, under specified conditions, to target levels of performance. Once an understanding of risk is paired with that of capability, gaps can be identified, thus informing priorities, developing or comparing courses of action, and informing decision making. In the Bay Area UASI context, the risk and capability assessment is a critical step in the project identification phase and articulates the link between critical local needs and national priorities.

Project Planning – In the project planning phase, the Management Team Project Lead, working closely with a team of technical experts from participating jurisdictions, defines the work tasks that are required to accomplish project deliverables and goals, and executes/supports required procurement processes. Project planning refines understanding and estimates of timeline, budget, schedule, roles and responsibilities for the Project Team and stakeholders, as well as project communication needs. Key documents of the planning stage in the Bay Area UASI context are the project plan, MOU/LOA Appendix A, RFP/Q solicitations, and vendor contracts.

Project Execution – In the project execution phase, the Project Lead carries out the project as defined in the plan, supported by team members as applicable. The Lead also reports on the current status of the project, identifying and analyzing any variances between plan and actual. As necessary, the Project Lead takes corrective action to update time, scope, and budget. In the Bay Area UASI context, the oversight of project execution is carried out by the Management Team and, at a technical level, through the associated Working Group.

Project Change Management – Project change management is the practice of controlling and documenting changes to the baseline project plan. Managing the project during the execution phase means monitoring actual against planned (baseline) progress and making the necessary course changes in schedule, scope, and/or budget to meet user and stakeholder expectations. In the Bay Area UASI context, the Project Lead makes change management requests to the General Manager or designee for approval. The General Manager then informs/seek approval from the Approval Authority, with higher dollar value projects having more specific reporting and approval requirements.

Project Close Out – In the project closure phase, the Project Lead carries out administrative and contractual procedures to end the project, working with the Grants Management Unit as necessary. This also includes defining lessons learned, which are key to improving similar projects in the future, as well as project and portfolio evaluation.

B. Identification

Responsibilities

The Bay Area UASI project identification process is guided by the Bay Area UASI Management Team with input from the subject matter technical experts in the Working Groups. It starts with a complex risk and capabilities assessment that results in a gap analysis. This analysis feeds into the update of the Bay Area Homeland Security Strategy and allocation and policy priorities put forth by the Advisory Group. Working Groups then identify projects to meet gaps and priorities and score proposals, which are vetted by the Advisory Group and ultimately approved by the Approval Authority. The process culminates in the Management Team completing the Homeland Security Grant Program application for approval by the Approval Authority.

In the process detailed below, approximate dates are provided for each step. However, note that these dates may vary based on changes in federal/state grant allocation and program schedules. In addition, the timeline provided below is not accurate for fiscal year 2012 but represents our best estimate for the future process. Working with the Risk Management Working Group, each year the Bay Area UASI Management Team will develop a project identification timeline for presentation to the Advisory Group and Approval Authority.

Risk and Capability Assessment

WHAT?	Assessment of assets and capability in order to produce a risk-based gap analysis
WHEN? August:	Annually- Kicks off in May and extends through <ul style="list-style-type: none">• Conduct Risk Assessment - May 1st – June 15th• Assess Regional Capabilities - June 15th – July 30th• Conduct Gap Analysis – August 1st – August 31st
WHO?	Working Groups/Operational Areas implement and Management

The Approval Authority Bylaws (July 2011 Section 8.1) specify that the Approval Authority must use a risk and capability-based methodology to apply for and allocate grant funds. This is consistent with guidance from the Department of Homeland Security, that all levels of government establish a foundation to justify and guide preparedness activities and investments. In addition, as of 2011, the Department of Homeland Security requires all grantees to develop and maintain a Threat Hazard Identification and Risk Assessment (THIRA). The Bay Area UASI Management Team initiated such a regional collaborative planning, risk validation analysis, and capabilities assessment in 2010.

The risk assessment process collects information and assigns a value to risks for the purpose of setting priorities, developing or comparing courses of action, and informing decision making. The determination of risk includes identification and characterization of threats, their

consequences, and our vulnerabilities. Such an understanding of risk is paired with an assessment of regional capabilities. This includes assessing preparedness and levels of readiness to perform critical tasks to accomplish a mission, function, or objective, under specified conditions, to target levels of performance. A capability may be delivered with any combination of properly planned, organized, equipped, trained, and exercised personnel that achieves the desired outcome. Once an understanding of risk is paired with that of capability, gaps can be identified, and thus we can best understand how to establish priorities and make resources decisions to address the region's most critical needs.

To be eligible for funding, jurisdictions within the Bay Area UASI must participate in the risk and capability assessment process on an annual basis. The risk assessment process lasts about four months starting in May and includes the following steps, conducted by the subject matter experts of the Working Groups and guided by the Bay Area UASI Management Team:

1. ***Kick Off*** – The Management Team, in conjunction with the Northern California Regional Intelligence Center (NCRIC), develops data collection timelines, requirements, and avenues for receiving information on threats, vulnerabilities, and consequences of loss. The Management Team organizes a kick off meeting to provide an overview of the process, risk analysis tool (Digital Sandbox Risk Analysis Center (RAC) tool box), and Protected Critical Infrastructure Information (PCII) requirements to Working Group participants. The Management Team provides follow up training as needed.
2. ***Risk Data Validation*** – Working Group members gather, validate, and verify asset data and an understanding of threat, vulnerabilities, and consequences for the region. The Northern California Regional Intelligence Center (NCRIC) conducts final review and validation, and then Digital Sandbox (risk management contractor) analyzes the asset data to prioritize target capability relevance.
3. ***Capability Assessment and Gap Analysis*** – The Management Team leads a process whereby capability assessment is mapped to risk to produce a risk-based gap analysis. This includes reviewing the risk analysis and capability information and scheduling workshops, meetings, and webinars to engage Working Group technical subject matter experts and jurisdictional representatives to assist in the assessment process. The Management Team determines whether prior year investments have sustained, reduced, or enhanced capabilities. It also reports on progress and gains technical input from members of the Advisory Group.

Participants in the Bay Area UASI then use the risk and gap analysis as a guide to determine strategic investments that mitigate risks, build capabilities, and address deficiencies. The information is incorporated in subsequent stages of the project identification process, such as in the development of the Bay Area Homeland Security Strategy, annual allocation and policy priorities identified by the Advisory Group, planning meetings to identify project proposals, and the development of the UASI grant application.

Bay Area Homeland Security Strategy

WHAT?	Comprehensive data driven document that outlines the Bay Area UASI's risks, capabilities, vision, structure, goals and objectives for homeland security
WHEN?	Updated every two years, informed by the results of the risk assessment (September 1 st - October 31 st)
WHO?	Working Groups provide input, Management Team implements, Approval Authority approves
DOCUMENTS	Guidance from the state, final Strategy document

Informed by the risk and capability assessment, the Bay Area Homeland Security Strategy is a comprehensive data driven document that outlines the Bay Area UASI's risks, capabilities, vision, structure, goals and objectives for homeland security. The goals and objectives are structured around closing identified risk and capability gaps. The associated implementation plan serves as a strategic guide for the region and jurisdictions to develop regional projects that will result in achievement of a particular objective.

The Strategy outlines a comprehensive system for enhancing regional capability that will guide the Bay Area UASI's efforts to:

- Prevent and disrupt terrorist attacks;
- Protect the people of the Bay Area, its critical infrastructure, and key resources;
- Respond to, and recover from, major incidents and all hazards that do occur;
- Continue to strengthen our preparedness foundation to ensure our long-term success; and
- Guide future investments, increase capabilities, and reduce risk.

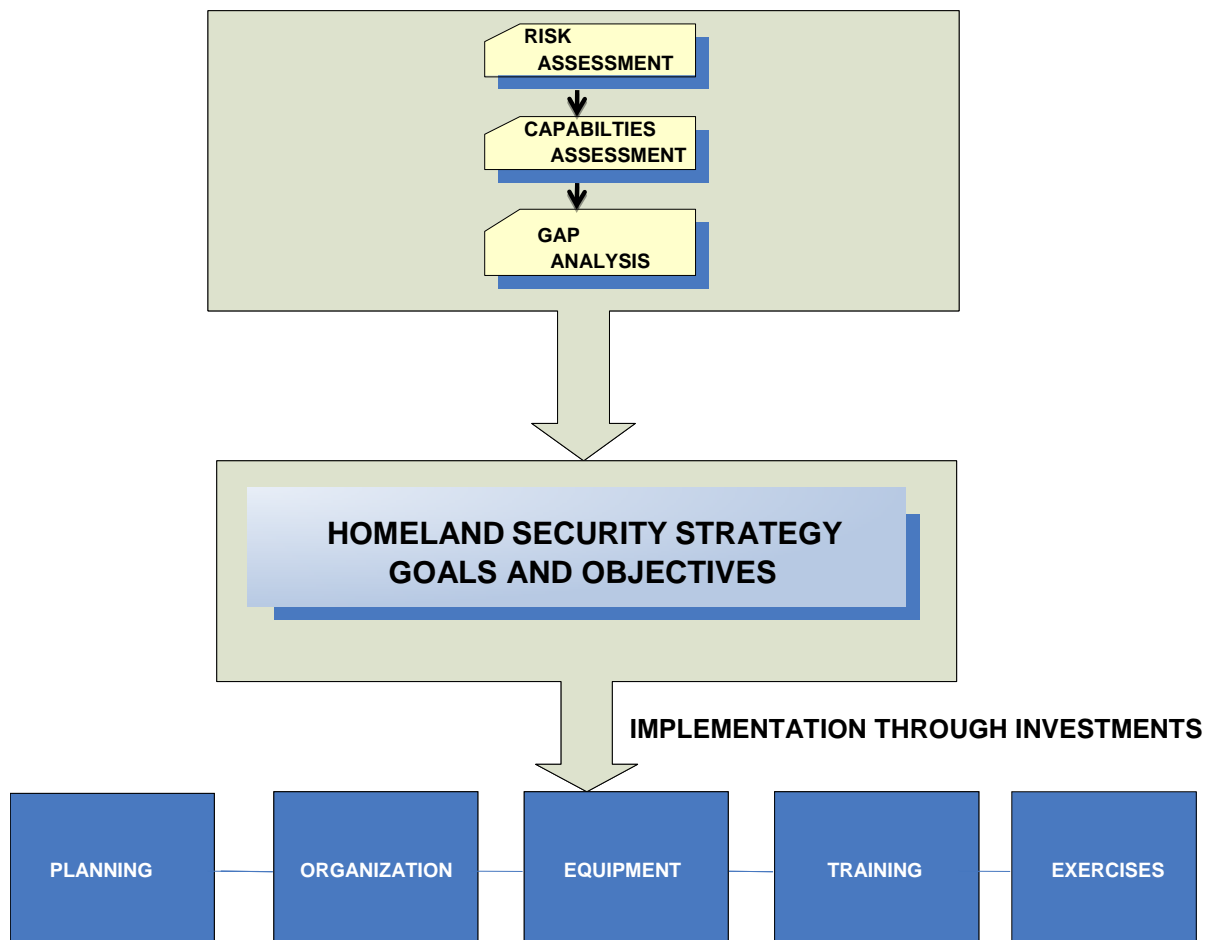
Having such a strategy allows the Bay Area to clearly track and articulate its risks and capability needs to local leaders, the State of California, and Department of Homeland Security. Homeland security strategies are the basis for requesting funds from the Homeland Security Grant Program, of which UASI funding is a part. As required, the Strategy addresses all FEMA mission areas—prepare for, protect against, respond to, recover from, and mitigate all hazards.

The Bay Area's homeland security goals are directly aligned with National Homeland Security Priorities (and/or the State of California Homeland Security Strategy Priorities) and are as follows:

- Develop a Regional Risk Management and Planning Program;
- Enhance Information Analysis and Infrastructure Protection Capabilities;
- Strengthen Communications and Interoperable Communications;

- Strengthen CBRNE Detection, Response, and Decontamination Capabilities;
- Enhance Medical, Public Health and Mass Care Preparedness;
- Strengthen Planning and Citizen Preparedness Capabilities;
- Enhance Recovery Capabilities; and
- Enhance Homeland Security Exercise, Evaluation and Training Programs.

The planning process used to develop the Strategy is shown below. From the risk assessment process that culminates in a gap analysis, strategic goals and objectives are developed along with implementation steps to track objectives through a series of resource elements divided among the elements of capability: Planning, Organization, Equipment purchase, Training, and Exercises (POETE). The Bay Area UASI Management Team guides this process with technical input from subject matter experts in the Working Groups.



The Bay Area Homeland Security Strategy was last updated in November 2011. Goals and objectives are directed towards the next three years, but the Management Team will review and update them every two years per FEMA guidance.

The final Strategy is presented by the Management Team to the Approval Authority for approval in October. The Management Team is also responsible for managing and tracking implementation of the Strategy with input from technical experts in the Working Groups—see “Portfolio Evaluation and Performance Metrics” under “E. Close Out” below.

Allocation and Policy Priorities

WHAT?	Allocation methodology and policy, based on the risk assessment, Bay Area Homeland Security Strategy, and funding levels
WHEN?	Annually in November
WHO?	Advisory Group proposes to Approval Authority

The Advisory Group determines allocation and policy priorities to provide guidance to the Working Groups in identifying and prioritizing project proposals. In determining annual allocation and policy priorities, the Advisory Group should incorporate the following:

- Gaps identified in the risk assessment process;
- Priorities highlighted in the Bay Area Homeland Security Strategy;
- Levels of funding available in the fiscal year;
- A fair and balanced regional and programmatic distribution;
- Opportunities to leverage and sustain existing investments;
- Annual overarching priorities for the State Homeland Security Program and UASI. This guidance is provided by Department of Homeland Security in their guidance and application kit issued in the spring; and
- Federal requirements for UASI funds, such as the mandate that 25% of allocations be dedicated to law enforcement terrorism prevention-oriented planning, organization, training, exercise, and equipment activities (LETPA).

The Bay Area UASI Management Team will provide to the Advisory Group allocation options for review and consideration. The Advisory Group determines the allocation and policy priorities and presents them to the Approval Authority for approval by November. The Bay Area UASI Management Team then incorporates this guidance into their proposal implementation guidance document and subsequent phases of the project identification process.

Proposals

WHAT? priorities	Project proposals, guided by allocation and policy
WHEN?	Annually, November - January
WHO?	Working Groups implement and Management Team provides support, oversight, and approval
DOCUMENTS	Proposal template, Management Team's Proposal Implementation Guidance

Guided by training, technical assistance, and support from the Bay Area UASI Management Team, Working Groups commence meetings in November to identify proposals based on the allocation and policy priorities provided by the Advisory Group as well as the gap analysis and Bay Area Homeland Security Strategy. The Working Groups are responsible for soliciting and gathering proposal information from each member jurisdiction.

Project proposals must meet the following criteria in order to be eligible for funding, per Department of Homeland Security guidelines:

- Have a high threat, high density urban area terrorism focus;
- Build regional capabilities, defined as capabilities for two or more counties;
- Enhance regional preparedness and directly support the national priority on expanding regional collaboration in the National Preparedness Guidelines;
- Align with the Bay Area Homeland Security Strategy and demonstrate a clear correlation between the goals, objectives, and priorities identified in the strategy;
- Support the federal investment strategy; and
- Incorporate Department of Homeland Security grant program funding priorities as well as other relevant national priorities.

Each year the Management Team produces a comprehensive “Proposal Implementation Guidance” tool in November to provide instructions to Working Group members, including information on allocations, relevant timelines, proposal criteria, allowable spending areas, and the proposal template. This guidance also encourages participants to seek and consider other sources of funding (e.g., State Homeland Security Program, Citizen Corps funding, etc.) in addition to UASI funds.

The proposal template includes information on:

- The requestor;
- Whether the proposal is for a new or continuing initiative;
- High level goals, key milestones, dates, and outcomes;

- How the proposed maps to mission areas, identified gaps, and Bay Area Homeland Security Strategy;
- How the proposed builds upon existing capabilities;
- Funding needed along the Planning, Organization, Equipment purchase, Training, and Exercises (POETE) continuum;
- Funding that could be obligated towards law enforcement terrorism prevention-oriented planning, organization, training, exercise, and equipment activities (LETPA);
- Funding that is, or might be, leveraged from other sources besides UASI; and
- Contingencies for scaling back activities in the event of decreased funding.

See Section VI (Templates) of this manual for the proposal template and Appendix A for a copy of the Management Team’s proposal implementation guidance from February, 2011. In future iterations of the implementation guidance, the Management Team will instruct Working Groups on how to score and prioritize proposals (see next section).

The Management Team, and in particular the Working Group liaisons who are Management Team staff members, work closely with the Working Groups to develop proposals that meet the specified criteria and fulfill requirements of the proposal template. The process should be completed by each January.

Scoring

WHAT?	Working Groups score and prioritize proposals
WHEN?	Annually in February
WHO?	Working Groups implement and Management Team provides support, oversight and approval
DOCUMENTS	Proposal scoring sheet and criteria

In the proposal implementation guidance provided by the Bay Area UASI Management Team, Working Groups are instructed to develop a finite number of proposals (approximately ten-twenty), score them using pre-determined criteria, and thus prioritize them. The end result is lists of proposals in order of priority that represent the collective thinking and recommendation of each Working Group. This process should be completed and approved by the Management Team by February.

Working Groups should prioritize proposals with the strongest business cases using the following criteria:

- Impact on existing critical gaps;
- Urgency;
- Strategic regional importance;

- Fostering sustainability of prior investments and/or providing critical support to projects already in progress;
- Best value for money, including the ability to leverage other funding streams;
- Greatest likelihood of success;
- Consistency with federal priorities and
- Balance of jurisdictional distribution.

Project Approval

WHAT?	Advisory Group reviews project proposals and makes recommendations to Approval Authority for final project approval
WHEN?	Final approval takes place by March
WHO?	Advisory Group and Approval Authority

The Bay Area UASI Management Team reviews the prioritized proposals from the Working Groups and may combine like proposals into larger projects as appropriate. Once reviewed and approved, the Management Team forwards project proposals in priority order from each Working Group to the Advisory Group for final funding recommendations.

The Advisory Group must have pre-identified criteria upon which they base final project recommendations for the Approval Authority, which should be consistent with the allocation and policy priorities they had developed at the beginning of the project identification process. In its final approval recommendations, the Advisory Group should also prioritize projects—either in list order or in low, medium, high categories—so that should funding levels change, new allocations can be swiftly made according to consistent criteria.

Upon review and additional analysis as needed, the Advisory Group forwards selected projects in prioritized order to the Approval Authority for final approval, which should take place by March.

Investment Justifications

WHAT?	Investment justifications are required by Department of Homeland Security and demonstrate how projects link to federal priorities
WHEN?	Annually in March
WHO? EMA	Management Team prepares and submits to Cal EMA
DOCUMENTS	Investment Justification template/ user reference guide from Department of Homeland Security

The Department of Homeland Security requires detailed investment justifications as part of the Homeland Security Grant application process. The investment justification must demonstrate how proposed projects address gaps and deficiencies in current capabilities. Once projects are approved by the Approval Authority, the Bay Area UASI Management Team groups like projects together into investment categories. Typically, there are approximately ten investment categories that mirror the Bay Area Homeland Security Strategy (e.g., CBRNE, Information Analysis, Interoperability, etc.), and each investment category includes a range of associated projects (approximately two to ten).

The Management Team prepares the Investment Justification document with guidance/ templates from the Department of Homeland Security and with technical input as needed from the Working Groups. These documents are prepared in March and submitted to the California Emergency Management Agency (Cal EMA).

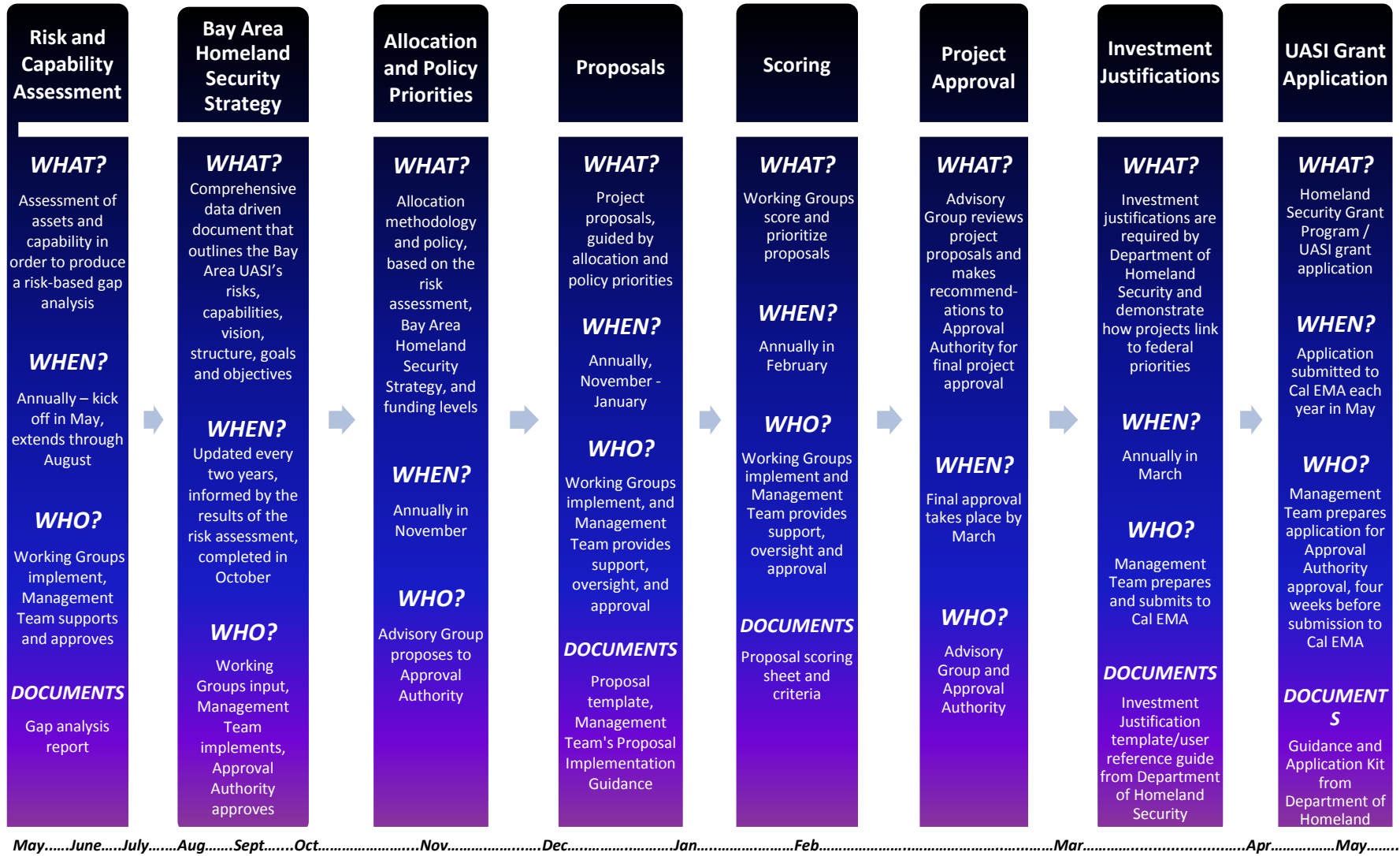
UASI Grant Application

WHAT? application	Homeland Security Grant Program/UASI grant
WHEN?	Application submitted to Cal EMA each year in May and to the federal level by June
WHO?	Management Team prepares application for Approval Authority approval, four weeks before submission to Cal EMA
DOCUMENTS	Guidance and Application Kit from Department of Homeland Security

The Bay Area UASI Management Team completes the UASI grant application, which includes projects and investment justifications, and submits it to the Advisory Group and Approval Authority for review in April. Upon approval, the Management Team sends it to the California Emergency Management Agency (Cal EMA), which ultimately forwards it to the Department of Homeland Security. The DHS deadline for final submission is in June.

Per the Approval Authority Bylaws (July 2011 Section 8.4), the General Manager reports to the Approval Authority on grant awards received from Cal EMA at the next regular meeting following the award. For the UASI grant, if the award is less than the application amount, the General Manager, after consulting with the Advisory Group, submits recommendations for reallocation to the Approval Authority for approval. The reallocation recommendation includes the grant projects, the amount of proposed funding for each project and the proposed breakdown of the funding for that project by category, and the jurisdictions proposed to receive the funding along with the amount of funding proposed for each jurisdiction.

Project Identification Summary



Note timelines may vary due to changes in federal/state grant allocation and program schedules

C. Planning

Responsibilities

The Project Lead of the Bay Area UASI Management Team is responsible for all aspects of the project planning phase, with significant support from partner jurisdictions and technical experts. Working with his or her team, the Project Lead defines the work tasks that are required to accomplish project deliverables and goals, and ensures required procurement processes are carried out, working with sub-recipient jurisdictions as necessary.

The planning phase produces a refined understanding and estimates of timeline, budget, schedule, roles and responsibilities for the Project Team and stakeholders, as well as project communication needs. Key documents of the planning stage are the project plan and, if applicable, Memoranda of Understanding (MOU)/Letters of Agreement (LOA), Request for Proposals (RFP)/Request for Qualifications (RFQ) solicitations, and vendor contracts. Once the project plan and any required MOU/LOA documents are completed and approved, the project is ready to begin implementation.

MOU/LOA Appendix A

The Memorandum of Understanding (MOU) document outlines an agreement between the sub-recipient and the City and County of San Francisco, which serves as the fiscal agent for the Bay Area UASI, to procure goods and services needed in project implementation. A Letter of Agreement (LOA) is a very similar document between the Bay Area UASI (acting by and through the Bay Area UASI Management Team) and another department within the City and County of San Francisco.

The MOU/LOA document contains an Appendix A entitled “Authorized Expenditures and Timelines” in which project information is detailed by solution area (Planning, Organization, Equipment purchase, Training, and Exercises–POETE), program description, deliverable due date, and amount. In order to provide accurate information in the Appendix A, the Project Lead must work with appropriate sub-recipient jurisdiction representatives, team members, and/or technical experts as needed to define and describe work tasks. MOU/LOAs must be completed, signed, and approved as part of the project planning phase. There are often multiple MOU/LOA agreements associated with a project, but in some cases, there may be none.

See Section IV of this manual on procurement for more information on executing and modifying MOU/LOA agreements. In particular, see “Appendix A – Authorized Expenditures and Timelines” for more information on allowable costs and requirements. In addition, the MOU/LOA Appendix A template can be found in Section VI.

Project Plan

The Project Lead is responsible for drafting a project plan for each of the projects in his or her portfolio. A project plan develops the details of a project that are further fleshed out and updated from the proposal stage, what was submitted and approved as part of the Investment Justification, and from the level of detail in MOU/LOA agreements, if applicable.

Project Leads should work with their team members, Working Group, and other subject matter experts to develop the project plan, working from the required template (See Section IV). In working collaboratively with team members, the Project Lead not only ensures that all technical bases are covered, but is also more likely to obtain the team's buy-in. The following elements are included in the project plan template. Note that the template also includes guidance which Project Leads should follow when completing the plan.

- Project goals and rationale;
- Project outcomes and requirements;
- Deliverables and requirements;
- Budget and timeline;
- Roles, responsibilities, and stakeholders;
- Communication;
- Risks and mitigation; and
- Approvals

The project plan is a key deliverable for the Project Lead, and it is the core governing document for the project to which the Lead and team members are held accountable. Information in the project plan must be consistent with that in the MOU/LOA agreements and vendor solicitations and contracts, if applicable. The length of time to prepare a project plan will vary due to the complexity, size, and number of stakeholders involved in the project, but this should usually range from a couple of days to a few weeks.

Project plans must be approved by the Bay Area UASI General Manager or designee. The General Manager may only approve a project plan once MOU/LOA agreements are completed/updated and approved, if applicable. Projects with budgets greater than \$250,000 must first be approved by the Approval Authority on the recommendation of the Advisory Group (see “Final Project Green Light” below). If possible and appropriate to the timeline of the project, the Project Lead should provide vendor solicitations/contracts at the time of project plan approval as well. The approval of the project plan is the final step in the planning phase and once approved, project implementation may begin.

Vendor Procurement

Many Bay Area UASI projects require contracts with outside vendors. In most cases, the contracting entity is a sub-recipient jurisdiction. Sub-recipients should use their own procurement procedures, regulations, and best practices, provided these conform to applicable federal law and standards. Sub-recipients are required to provide the Management Team's Grants Management Unit a copy of their procurement policies for review. The sub-recipient

jurisdiction must also comply with all relevant guidelines laid out in this manual, including those in Section IV on procurement, as well as meet the approval requirements listed in the next section. Working with the Grant Management Unit, the Project Lead is responsible for oversight and support to sub-recipients on procurement processes as needed. The Management Team is available to support jurisdictions with best practices concerning vendor solicitation, selection, negotiation, and management.

In cases when a project does not include sub-recipient jurisdiction funding, all procurement processes are the responsibility of the Project Lead, working in partnership with the Grants Management Unit, and should be conducted per the policies and procedures of the City and Country of San Francisco as the Bay Area UASI fiscal agent. Detail on this process is included in Section IV on procurement below (see “San Francisco Procurement Process for Professional Services Contracts”).

In all vendor contracting processes, the Project Lead should work closely with their team/subject matter experts to develop solicitations and contracts that are technically accurate and consistent with details in the project plan and MOU/LOA agreements, if applicable.

Approval of Vendor Solicitations and Contracts

All **solicitations** for contract services must be reviewed and approved by Bay Area UASI General Manager or designee. In addition, the General Manager or designee will share all contract solicitations in amounts above \$250,000 with the Advisory Group and Approval Authority for review before issuance by the Management Team or the sub-recipient jurisdiction. For solicitations below the \$250,000 threshold, the General Manager will inform the Advisory Group and Approval Authority of their issuance at their next scheduled meetings.

All **contracts** must be reviewed and approved by the Bay Area UASI Grants Management Unit and the General Manager or designee. In addition, the General Manager will share a draft contract that has been successfully negotiated with a selected proposer for projects in excess of \$250,000 with the Advisory Group and Approval Authority for approval.

To obtain approval by the Bay Area UASI Management Team and Approval Authority, all solicitation processes/contracts must, at a minimum:

Solicitation phase:

- **Engage in a full and open competitive bidding process** or a sole source process as determined by local policy, provided that such a process is not in conflict with federal regulations which supersede it.
- **Obtain a state sole source approval** if there is only one bid or only one vendor that can perform the services required. In such cases the contracting entity must transmit a sole source request to the Grants Management Unit for submission to the State.

Selection phase:

- ***Include a selection panel that is comprised of subject matter experts*** from among regional stakeholders. The Project Lead and any team members who worked on the Request for Proposals (RFP)/Request for Qualifications (RFQ) may not serve on the selection panel, but may coordinate selection panel logistics, provide technical input, and/or observe the process. The selection panel should consist of an odd number of people ranging from three to seven members.
- ***Make a selection based on criteria that is published in the RFP/Q.*** Evaluating proposals or making comments based on previous experiences or hearsay should be discouraged. Panelists should be directed to focus on the information in the proposals and base their evaluation and selection on those materials.
- ***Observe confidentiality.*** Panelists should not, under any circumstances, contact or communicate with any of the proposers or anyone outside of the selection panel process, including members of the Approval Authority and the Management Team. Names of the proposed bidders should also be held in confidence. This lock-down of information is intended to preserve integrity and fairness.
- ***Include signed impartiality/conflict of interest statements for selection panel members.*** See template in Section VI. A panelist is prohibited from participating in an RFP/Q screening or evaluation process if he or she, or any member of his or her immediate family (including spouse/domestic partner and dependent children):
 - Has received income or gifts within the past year from any of the proposers;
 - Has any ownership interest or other direct or indirect investments, other than mutual funds, in any of the proposers;
 - Expects or intends to seek employment or any other relationship with any of the proposers; and/or
 - Has any other direct or indirect interest in any of the proposers that would prevent him or her from exercising fair and impartial judgment when participating in the RFP screening or evaluation process.

Where a recipient of federal funds makes sub-awards under any competitive process and an actual conflict or an appearance of a conflict of interest exists, the person for whom the actual or apparent conflict of interest exists should recuse himself or herself not only from reviewing the application for which the conflict exists, but also from the evaluation of all competing applications. See also Section II of this manual for more information on ethical and conflict of interest standards.

Negotiation/ contract stage:

- ***Contain costs that are reasonable and consistent*** with the amount paid for similar services in the market place—a reasonable cost/price analysis must be conducted by the Project Team.
- ***Include a clearly written scope of services***, tangible deliverables, clear performance periods, and a schedule of payments by deliverable.
- ***Be performed and paid in entirety within the grant performance period.***

Final Project Green Light

In the final project approval process, the Project Lead is required to present the completed project plan and, if applicable, MOU/LOA agreements. In addition, if applicable, possible, and appropriate to the timeline of the project, the Project Lead should provide vendor solicitations and contracts at the time of final approval as well.

The Bay Area UASI General Manager or designee approves the project, ensuring the documentation is complete, accurate, and consistent, and that the project approach is sound and in line with the high level goals, outcomes, and timeline approved at the proposal stage. If a project meets these standards, the General Manager or designee provides the green light for implementation to begin. For projects with budgets less than \$250,000, the General Manager should notify the Advisory Group and Approval Authority of such approval at their next scheduled meetings. For projects with budgets in excess of \$250,000, which are most Bay Area UASI projects, the General Manager must first gain approval from the Approval Authority on the recommendation of the Advisory Group before the project may begin.

At his or her discretion, the Bay Area UASI General Manager or designee may approve the project and permit the project to launch with only a contract solicitation document and without a final, signed contract. However, the project plan and any MOU/LOA documents, if applicable, must be final and approved in all instances before a project may begin.

D. Execution

Responsibilities

The Project execution phase begins once the project plan and associated documents are approved. In execution, the Project Lead carries out the project as defined in the documented plan. In addition, sub-recipient jurisdictions are responsible for carrying out all terms and conditions of their Memoranda of Understanding/Letters of Agreement (MOU/LOAs), in close communication with the Project Lead.

The Project Lead reports on the current status of the project, identifying and analyzing any variances between the plan and actual project. As necessary, the Project Lead seeks corrective actions to update timeline, scope, and budget, and updates project documents accordingly. Oversight of project execution is carried out by the Bay Area UASI Management Team and, at a technical level, through the associated Working Group. The Bay Area UASI General Manager or designee is responsible for reporting on project progress and change management to the Advisory Group and Approval Authority.

Kick Off

A project kick off meeting organized by the Project Lead is often an appropriate way to begin work on a new project and is an identified best practice in project management. This meeting involves relevant team members and stakeholders, and could include the following activities:

- Senior managers demonstrating to the project participants their support for the effort;
- Review of the project plan;
- Relationship building among team members;
- Explanations of operating procedures; and
- Work on immediate first steps as laid out in the project plan.

Document and Records Management

Project Leads must maintain complete and accurate records on all program activities. This includes meeting agendas, meeting minutes, progress reports, project plans and agreements, and interim and final deliverables. They must also ensure project team members and stakeholders receive relevant documentation and communications in a timely manner.

Project Leads are responsible for adhering to office administrative policies related to document organization and management. They are required to store information in an organized fashion that is accessible to other members of the Project Team and the Bay Area UASI Management Team. They are also responsible for retaining documents and records related to their projects for a period of three years after the close of the grant.

Sub-recipient jurisdictions are required to adhere to their home office policies and procedures regarding document and records management, the terms and conditions of their MOU/LOA agreements, as well as the provisions in the procurement and financial management sections of this manual. All sub-recipients are required to retain all documentation related to project implementation and expenses reimbursed under the Bay Area UASI for a period of three years after the close of the grant. All records associated with Bay Area UASI projects must be made available to the Bay Area UASI Management Team, and financial records are also subject to review by the California Emergency Management Agency (Cal EMA) and the Department of Homeland Security staff.

Reporting

Successful project execution requires a variety of reporting at all levels of the Bay Area UASI, and in most instances the responsibility for this rests with the Project Lead. Reporting requirements include the following:

- ***Project Team Status Check In*** – The Project Lead is responsible for checking in with his or her team, vendors, and/or and partner jurisdictions to make progress on deliverables as stated in the project plan/vendor contract. For more complex projects, project team meetings may need to occur weekly or biweekly. Meetings may occur by phone, email, or in person. The Project Lead should work with team members on an ongoing basis to ensure that expectations are synchronized with what has been accomplished, what needs to be accomplished, and the challenges being encountered. The Project Lead should facilitate the communication between team members who own dependent tasks so that successor tasks can begin as soon as possible after predecessor tasks are complete.
- ***Working Group Check In*** – The Project Lead is responsible for regular reporting on project progress in the technical Working Group associated with the project. The subject matter experts in the Working Group play an important role in providing technical oversight during project execution. The frequency and detail of such reporting should be determined by the group.
- ***Portfolio Meetings with the Bay Area UASI General Manager*** – The Project Lead is responsible for regular project portfolio reporting to the Bay Area UASI General Manager or designee. These face-to-face meetings should take place at least biweekly, and discussion of higher risk/higher cost projects should take precedence. The Project Lead should include the following in his or her reporting:
 - Implementation accomplishments for the reporting period;
 - Implementation challenges for the period and how they are being addressed;
 - Progress on scope, schedule, and budget, and deviations from that agreed to in project plans;
 - Action plan for the next reporting period and input on key decisions as appropriate; and
 - Discussion and decisions as appropriate on needed changes in project scope, schedule or budget.
- ***Grants Compliance Reporting*** – So that the Bay Area UASI may remain in compliance with federal and state policies and procedures, sub-recipient jurisdictions and Project Leads are responsible for program and financial reporting as directed by the Grants Management Unit. This includes quarterly reports during implementation. For more information on sub-recipient monitoring and reporting see Section V of this manual .
- ***Quarterly Advisory Group and Approval Authority Reporting*** – The Bay Area UASI General Manager or designee is responsible for reporting on project progress to the Advisory Group and Approval Authority. The General Manager may single out high

risk/high cost projects for regular progress reporting, as directed by the Approval Authority. On a quarterly basis, the General Manager will provide portfolio status and financial reports detailing progress by jurisdiction sub-recipient as well as technical subject matter area. The General Manager will develop and share templates for such reports with the Advisory Group and Approval Authority for feedback and approval.

Change Management Procedures for Timeline and Scope

Project change management is the practice of controlling and documenting changes to the baseline project plan. The baseline is the most recently approved version of the project plan. Most projects are dynamic in nature, and if the Project Lead doesn't keep the baseline plan up-to-date, it will soon become ineffective. Managing the project during the implementation stage means monitoring actual activity against planned (baseline) progress and making the necessary course changes in schedule, scope, and/or budget to meet user and stakeholder expectations. It is a project management best practice to document all approved changes to the baseline project plan. This is important in order to understand how the project changed over time and why, and in order to continue to have a clear and approved road map for implementation.

The Project Lead is responsible for project change management and must make requests for timeline and scope changes to the Bay Area UASI General Manager or designee in a timely manner during regular portfolio reporting meetings (see "Reporting" above). The General Manager will carefully review such requests for both consistency with the project goals and objectives stated in the project plan as well as the Bay Area Homeland Security Strategy.

Sub-recipients should notify the Project Lead in the event they are unable to meet their deliverable due dates and specifications as approved in their MOU/LOA document. A request for an extension of the performance period should be at least 90 calendar days before the end date of the performance period, if not sooner. See "E. Modifications to MOU/LOAs" in Section IV on procurement below.

The General Manager is responsible for ensuring that significant changes in timeline and scope, and their associated rationale, are reported in the quarterly report to the Advisory Group and Approval Authority (see "Reporting" above). At a minimum, the General Manager must report any timeline and scope changes for projects with budgets over \$250,000 that:

- Delay the final project completion date by more than six months;
- Result in modifications to MOUs/LOAs;
- Result in contract amendments; and/or;
- Lead to significant changes in key deliverables or project stakeholders.

Modification of Grant Allocations

As with updates to timeline and scope, changes in budget are also part of project change management. The Project Lead must seek approval for needed grant allocation changes from the General Manager or designee during regular portfolio meetings and update the baseline project plan with approved changes. Sub-recipient jurisdictions are responsible for promptly notifying the Project Lead when spending potentially could or should diverge from budget amounts in MOU/LOA agreements.

A project may only expend on previously approved activities at previously approved levels, unless otherwise directed by the General Manager or designee. The General Manager may only make reallocations which are consistent with the original scope, goals, and purposes of the project as defined in the project plan and MOU/LOA agreements and vendor contracts, if applicable, and should also bear in mind jurisdictional balance.

Section 8.6 of the July 2011 Approval Authority Bylaws governs grant modifications. Within a grant project, the Bay Area UASI General Manager may reallocate funds up to a cumulative total of \$250,000. This authority allows the General Manager to modify the allocation by transferring funds between categories within a project, or among jurisdictions that have received grant funds for that project. This authority also allows the General Manager to modify allocations across grant years for a particular project, for the purpose of expending grant funds within applicable grant performance periods. The General Manager reports back any reallocations to the Approval Authority and Advisory Group at the next regularly scheduled meeting.

The General Manager should bring any modification that exceeds \$250,000 individually or cumulatively for a project to the Approval Authority and Advisory Group for approval prior to the modification. The General Manager must obtain appropriate approvals from the California Emergency Management Agency (Cal EMA) for such grant modifications. Once the Bay Area UASI receives approval from Cal EMA for the modification, the Grants Management Unit will notify sub-recipients, as appropriate. Sub-recipients should not expend funds until the modification has been approved. See “E. Modifications to MOU/LOAs” in Section IV on procurement below.

Should expenditures for a project be lower than originally budgeted but still have met the goals and purposes of the project, remaining funds should be used to fund additional incentives. In such a scenario, the Approval Authority should return to the prioritized list of projects received from the Advisory Group at the end of the project identification phase in order to identify new projects for funding.

Monitoring

Project Leads are responsible for monitoring the progress of their projects and meeting timeline, budget, and quality standards as specified in the project plan and other project documents, if applicable. A key tool in such monitoring is the project team status check in. The Bay Area UASI General Manager or designee provides oversight through regularly scheduled portfolio

reporting meetings with Project Leads as well as provides regular reporting on project status to the Advisory Group and Approval Authority (see “Reporting” above).

The Bay Area UASI Management Team is responsible for monitoring sub-recipients to determine effectiveness and efficiency of operations, reliability of reporting and recordkeeping, and compliance level. The Grants Management Unit accomplishes monitoring through a combination of desk-based reviews and on-site monitoring visits. Monitoring involves review and analysis of financial, programmatic, performance and administrative issues, and identifies areas where technical assistance and other support may be needed. The sub-recipient is responsible for resolving any monitoring findings (i.e., findings of non-performance or non-compliance) in a timely manner by a corrective action plan and technical assistance in association with the Management Team. See “C. Sub-recipient Monitoring” in Section V on financial management below for more information.

Deliverable Quality Standards

The Project Lead is ultimately responsible for project quality and outcomes. He or she must ensure that project deliverables are of high quality and meet specifications in the project plan and other project documents, if applicable. For those projects that include sub-recipient award financing, the sub-recipient jurisdiction is responsible for achieving high quality and timely deliverables as specified in the MOU/LOA agreement, and the Project Lead provides support and oversight in this regard.

Project Leads and sub-recipient jurisdictions are responsible for providing oversight and management to professional services consultants and ensuring deliverable quality and timeliness. Payments to vendors should be structured by deliverable and should not be authorized by the contract holder until quality standards have been met by the vendor.

All written products associated with projects—including Word, Excel, and PowerPoint documents as well as email communications—should be clear, organized, accurate, to the point, and timely. The “second pair of eyes” standard should be applied as a general rule for final deliverables—these should be reviewed by the General Manager or designee before being issued. Final deliverables should also be reviewed by the subject matter experts in the Working Group for technical accuracy.

E. Close Out

Administrative Close Out

At project end, the Project Lead is responsible for ensuring that electronic and hard copy files are archived in an orderly and easily accessible fashion. To preserve storage space, unnecessary documentation should be deleted. Hard copies of final products should be retained.

The Management Team's Grants Management Unit will work with sub-recipient jurisdictions as needed to make sure all sub-grant allocations are properly closed out. From a financial management perspective, the closeout of a grant is the process by which the California Emergency Management Agency (Cal EMA) determines that all applicable administrative actions and all required work of the grant have been completed by the Bay Area UASI. Once the close out process is achieved, revenues should match expenditures, and all general ledger accounts should be cleared in FAMIS, the City and County of San Francisco budget and accounting system. Sub-recipient jurisdictions are required to retain all documentation related to project implementation and expenses reimbursed under the Bay Area UASI for a period of three years after the close of the grant. This retention period will commence upon final close-out of the grant.

Lessons Learned

Once a project is complete, the Project Lead is responsible for preparing a "lessons learned" document or having a lessons learned discussion in the technical Working Group associated with the project, which is key to improving similar work in the future. Some questions to consider include:

- Did the project achieve its outcomes/requirements as stated in the project plan?
- What went well and why?
- What went wrong and why?
- What did we do about it?
- What else might we have done?
- What are lessons learned for future projects and teams?

Portfolio Evaluation and Performance Metrics

In May of each year, the Bay Area UASI Management Team works with the Working Groups to evaluate progress and measure performance on the portfolio of Bay Area UASI projects. Using the Bay Area Homeland Security Strategy as a reference, the Management Team:

- Inventories projects based on each capability and strategic goal.;
- Tracks whether implementation steps within each objective are complete, partially complete, or ongoing, which shows allocation of resources and improvement in

capability along the Planning, Organization, Equipment purchase, Training, and Exercises (POETE) continuum;

- Updates the outcome for each objective.

Other efforts to evaluate the portfolio of Bay Area UASI projects include: reviewing and analyzing After Action Reports (AAR) and improvement plans to determine whether we are enhancing capabilities and overall preparedness, as well as identifying multi-year training and exercise plans to assess and test capabilities. Exercises should be designed around testing and evaluating the region's ability to prevent, protect against, mitigate, respond to and recover from the highest risk terrorism scenarios. See the Bay Area Homeland Security Strategy section on evaluation for more information on portfolio evaluation.

Drawing from this analysis, the Management Team identifies Bay Area-specific performance measures based on FEMA's Target Capabilities List and National Incident Management System (NIMS) Standardized Emergency Management System (SEMS) resource types. Both the Target Capabilities List and the NIMS/SEMS lay out critical tasks, performance measures, targets and standards for resources that can serve as useful indicators regarding the current level of preparedness in a given capability area. However, these are not tailored to the specific needs of a given jurisdiction or region. Therefore, the Bay Area must define those targets, measures, and metrics specifically for the region and should do so according to federal standards in the near future.

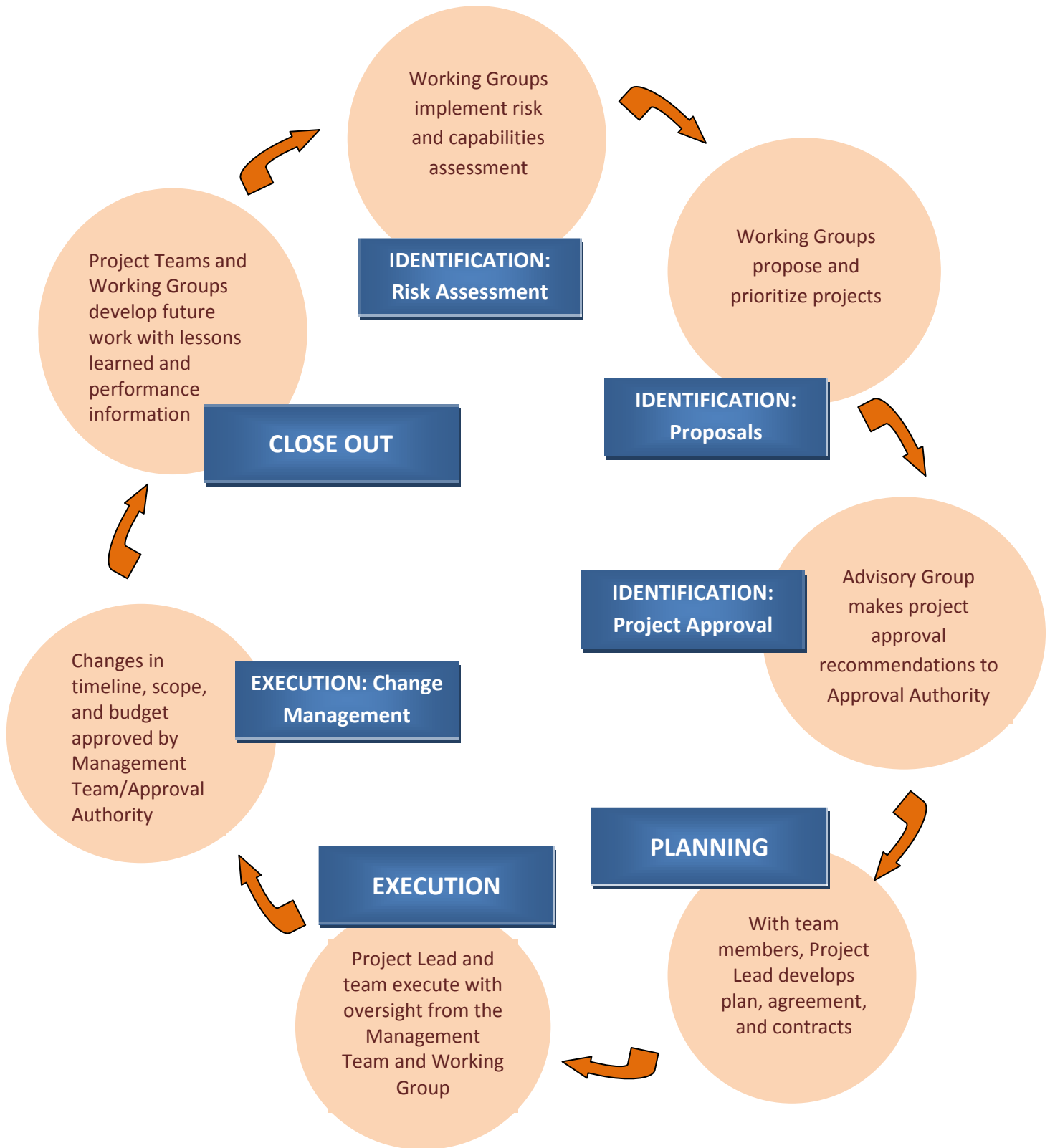
The Management Team reports to the Advisory Group and Approval Authority on portfolio evaluation and performance metrics. Towards these ends, the Management Team:

- Produces a Bay Area Annual Report that outlines the annual accomplishments and major activities so stakeholders are kept informed.
- Conducts grant effectiveness analysis and produces grant effectiveness reports to demonstrate the value of UASI and other homeland security grants to local, state, and national leaders.

The Bay Area UASI uses information on portfolio performance and metrics, as well as updates to the Bay Area Homeland Security Strategy, to inform the next cycle of needs, capabilities, and gap assessment, and thus the next cycle of project identification.

The Bay Area UASI evaluation process will also integrate with and support the State of California Metrics Project, which seeks to similarly measure the effectiveness of homeland security investments and capability levels across the State, as well as the DHS-mandated State Preparedness Report (SPR) and the SPR survey tool.

F. Summary of the Project Cycle



G. Summary of the Project Team

	Project Lead	Sub-recipient Jurisdictions	Working Group
	<i>The Project Lead is a Program/Project Manager with the Bay Area UASI Management Team</i>	<i>Sub-recipient jurisdictions are key members of the Project Team and often implement vendor solicitations and contracts</i>	<i>Each project is associated with a technical Working Group, which is comprised of regional subject matter experts</i>
Planning	<i>With team members, the Lead is responsible for all aspects of project planning, including MOU/LOA agreements, the project plan, and vendor solicitations and contracts.</i>	<i>Sub-recipient jurisdictions help define project tasks and deliverables, working closely with the Lead. They often implement vendor solicitations and contracts for projects.</i>	<i>The Working Group guides the Project Team in developing the project plan and the scope of work for any vendor solicitations and contracts.</i>
	<i>With team members, the Lead is responsible for all aspects of the project execution phase, including managing changes in budget, timeline, and scope. The Lead reports regularly on progress to the Working Group.</i>	<i>Sub-recipient jurisdictions are responsible for carrying out the terms and conditions of their MOU/LOA agreements and working with the Lead to implement the project per the project plan.</i>	<i>The Working Group hears progress updates from the Lead and provides technical oversight during project execution.</i>
	<i>With team members, the Lead is responsible for documenting and discussing project lessons learned with the Working Group.</i>	<i>Sub-recipients work with the Grants Management Unit to close out sub-grant allocations per Cal EMA specifications.</i>	<i>The Working Group applies lessons learned and inputs into portfolio evaluation and performance metrics to improve future project outcomes.</i>

IV. PROCUREMENT

Procurement includes hiring, purchasing of supplies, and soliciting for professional services. The Bay Area UASI Management Team has responsibility for oversight of procurement processes that utilize federal funds received by the Authority. The Grants Management Unit ensures compliance with federal laws, regulations, executive orders, Office of Management and Budget (OMB) circulars, departmental policy, award terms and conditions, and state and local requirements.

When a jurisdiction is the sub-recipient of award funds, the sub-recipient is responsible for procurement processes and should use procurement procedures and regulations from that jurisdiction, provided these procurement procedures and regulations conform to applicable federal law and standards. Working with the Grant Management Unit, the Bay Area UASI Management Team Project Lead is responsible for oversight and support to sub-recipients on procurement processes as needed.

In cases when a project does not include sub-recipient funding, all procurement processes are the responsibility of the Project Lead, working in partnership with the Grants Management Unit, and are conducted per the policies and procedures of the City and County of San Francisco as the Bay Area UASI fiscal agent.

A. Types of Agreements

The Bay Area UASI Program, through the Grants Management Unit, administers three types of contracting agreements:

- ***Memoranda of Understanding (MOU)*** – This is an agreement between the City and County of San Francisco, in its capacity as the fiscal agent for the UASI Approval Authority, and a sub-recipient jurisdiction. This document is a requirement when a jurisdiction is a sub-recipient of federal award funds.
- ***Letters of Agreement (LOA)*** – This is an agreement between Bay Area UASI, acting by and through the Bay Area UASI Management Team, and another department within the City and County of San Francisco.
- ***Professional Services Contracts*** – This is an agreement between the City and County of San Francisco and a vendor for services that require advanced specialized knowledge or expertise.

B. Content of the MOU/LOA

MOUs and LOAs consist of the following sections:

- ***Boilerplate Agreement***

The boilerplate of an MOU contains the following twelve articles:

- Article 1 – Definitions
- Article 2 – Allocation and Certification of Grant Funds; Limitation on San Francisco’s Obligations
- Article 3 – Performance of the Agreement
- Article 4 – Reporting Requirements; Audits
- Article 5 – Representations and Warranties
- Article 6 – Indemnification and General Liability
- Article 7 – Events of Default and Remedies; Termination for Convenience
- Article 8 – Assignments
- Article 9 – Notice and Other Communications
- Article 10 – Miscellaneous
- Article 11 – Insurance
- Article 12 – Compliance

The boilerplate of an LOA contains the following two articles:

- Article 1 – Performance of the Agreement
 - Article 2 – Notices and Other Communications
- ***Appendix A*** – “Authorized Expenditures and Timelines,” which details information by solution area (Planning, Organization, Equipment purchase, Training, and Exercises–POETE), program description, deliverable due date, and amount. See next section, “C. Appendix A – Authorized Expenditures and Timelines,” for more information on allowable costs and requirements for reimbursement.
 - ***Appendix B*** – “Grant Assurances,” which outlines compliance requirements and the sub-recipient’s obligations under the grant. Each page of this document must be initialed and signed by an authorized agent. See the template in Section VI.
 - ***Appendix C*** – “Form of Reimbursement Request,” which must be submitted to the Bay Area UASI Management Team when requesting reimbursement along with Schedule 1 (list of authorized expenditures) and Schedule 2 (grant match documentation, if applicable). See the template in Section VI. Grant match documentation must include all cash appropriations of non-federal funds and all in-kind services (in dollar values) that the sub-recipient intends to use for its grant match. The sub-recipient may not submit a reimbursement request until the Grants Management Unit approves the grant match plan.

C. MOU/LOA Appendix A - Authorized Expenditures and Timelines

All allowable UASI sub-grant award expenditures must fall into one of six solution areas. The solutions areas are: Planning, Organization, Equipment purchase, Training, and Exercise (POETE). The MOU/LOA Appendix A template can be found in Section VI of this manual.

Planning

The MOU/LOA obligations regarding planning include:

- **Personnel** – Prior to any sub-recipient expenditures for personnel, sub-recipients must submit completed job descriptions to the Bay Area UASI Management Team Project Lead detailing the planning activities the personnel will complete and the deliverables that will be produced. Prior to reimbursement, the sub-recipient must submit the following: all functional time sheets or allocation plans, payroll documentation or cancelled checks showing payment of salaries and benefits, and work product or certification that work was completed.
- **Contracts** – All contracts must be pre-approved by the Bay Area UASI General Manager or designee and Grants Management Unit prior to execution. All contracts must comply with the contracting laws and best practices of their jurisdictions, and sub-recipients are required to provide the Grants Management Unit a copy of their procurement policies for review. See “Approval of Vendor Solicitations and Contracts” under “C. Planning” in Section III on the project cycle above for more information on criteria that must be met for contracts to be approved.
- **Travel** – Travel for planning activities must be pre-approved by the Bay Area UASI General Manager or designee prior to scheduling, per the Bay Area UASI Travel Policy (see Appendix B). Invoices must include all backup documentation, including conference agendas, programs, brochures, lodging receipts, per diem calculations, airfare receipts/boarding passes, mileage calculations, and proof of payment.

Organization

Eligible organization expenses that must be documented in the MOU/LOA include:

- Responding to an increase in the threat level under the Homeland Security Advisory System, or needs resulting from a National Special Security Event;
- Establishing, enhancing, and staffing State and Major Urban Area fusion Centers;
- Paying salaries and benefits for personnel to serve as qualified intelligence

Analysts; and

- Paying related Overtime and Operational Overtime costs.

Equipment

The MOU/LOA obligations for equipment include:

- As allowable under federal guidelines, procurement of equipment must follow local policies and procedures for competitive purchasing.
- At a minimum, more than one quote or bid must be obtained, unless a sole source is justified. If sole source approval is needed, the sub-recipient must transmit the request to the Grants Management Unit for request to the State.
- Prior to reimbursement, the sub-recipient must submit to the Grants Management Unit all invoices, Authorized Equipment List (AEL) numbers, and a list of all equipment identification numbers and the deployed locations.
- A performance bond for any aircraft, water craft, or vehicle as well as any individual equipment item in excess of \$250,000.
- FEMA Environmental and Historic Preservation (EHP) approval, if required. Such a requirement will be conveyed by the Bay Area UASI Management Team Project Lead to the sub-recipient during the project identification stage.

Training

The MOU/LOA obligations for training include:

- All training courses must be pre-approved by the California Emergency Management Agency (Cal EMA) and require an approved FEMA Environmental and Historic Preservation Screening Memo (EHPSM).
- All expenses must be pre-approved by the Bay Area UASI Management Team Project Lead prior to scheduling.
- Training course expenses may include backfill/overtime, travel, tuition, per diem or other grant eligible expenses.
- When seeking reimbursement for grant eligible expenses, the sub-recipient must submit the following:

- Completed financial management workbook training ledger page indicating course title, feedback number, and sub category (e.g., overtime, backfill, course development);
- Registration receipts and agendas; and
- Copies of participant sign in sheets with supervisor's signature.

Exercise

The MOU/LOA obligations for exercise include:

- All exercises and associated sites require an approved FEMA Environmental and Historic Preservation Screening Memo (EHPSM).
- All expenses must be pre-approved by the Bay Area UASI Management Team Project Lead prior to scheduling.
- Exercise expenses may include backfill/overtime, travel, tuition, per diem or other grant eligible expenses.
- When seeking reimbursement for grant eligible expenses, sub-recipients must submit the following:
 - Completed financial management workbook exercise ledger page indicating exercise title and sub category (e.g., overtime, backfill, course development);
 - Copy of After Action Report (due to Cal EMA no later than 60 days after the exercise; and
 - Copies of participant sign in sheets with supervisor's signature.

D. Executing the MOU/LOA

It takes approximately two months for an MOU/LOA to be drafted and approved, but this can be longer depending on the workload of the participating parties and the complexity of the work. The following is a sample process and timeline for MOU/LOA agreements. This applies both to MOUs/LOAs drafted for the first time as well as modifications to existing agreements.

1. ***Drafting of Appendix A*** – The Bay Area UASI Management Team Project Lead drafts the Appendix A of the agreement in close cooperation with the sub-recipient jurisdiction (MOU) or City and County of San Francisco Department (LOA), and with assistance as needed from the Grants Management Unit – (5 working days).
2. ***Grants Management Unit Review*** – The Grants Management Unit reviews and approves the Appendix A from a compliance perspective as well as compiles required

documentation for the agreement, such as the boilerplate language and other appendices – (5 working days).

3. **City Attorney Review** – Once approved by the Grants Management Unit, the Grants Management Unit forwards the agreement to the City and County of San Francisco City Attorney for review – (10 working days).
4. **Sub-recipient Signature** – Once approved by the City Attorney, the Grants Management Unit PDFs the document and sends it to the sub-recipient jurisdiction/City department for signature – (15 working days).
5. **City Attorney Signature** – Once two (2) original MOUs, signed by the sub-recipient are returned, the Grants Management Unit sends the documents to the City and County of San Francisco City Attorney for signature – (5 working days).
6. **DEM Signature** – Once signed by the City Attorney, the Grants Management Unit sends the agreement to the Director of the City and County of San Francisco Department of Emergency Management (DEM) for signature – (5 working days).
7. **Final Project Approval** – The agreement is now finalized. Projects may not begin implementation until all relevant MOU/LOA documents and the project plan is finalized, and project approval is provided by the General Manager and/or the Approval Authority. See “Final Project Green Light” under “C. Planning” in Section III on the project cycle above.

E. Modifications to the MOU/LOA

Sub-recipient jurisdictions must make requests for budget, programmatic, and/or administrative changes to MOUs/LOAs to the Bay Area UASI Management Team Project Lead. In particular, sub-recipients should immediately notify the Project Lead in the event they may not be able to meet their deliverable due dates and specifications as approved in their MOU/LOA document. Sub-recipients are encouraged to request modifications early in order to facilitate timely performance and close out of the grant. A request for an extension of the performance period should be made at least 90 calendar days before the end date of the performance period if not sooner. Per the timeline above, a modification request takes roughly two months to process and could take more depending on the workload of applicable parties and the complexity of the work and proposed changes. Sub-recipients should not expend funds until the MOU/LOA agreement has been formally updated and signed.

The Project Lead is ultimately responsible for all project change management, including updates to MOU/LOA agreements. The Project Lead must make requests for changes to the Bay Area UASI General Manager during regular portfolio reporting meetings and gain approval for such changes. The General Manager reports to the Advisory Group and Approval Authority on any modifications to MOUs/LOAs for projects with budgets above \$250,000. In addition, budget

modifications in excess of \$250,000 must be approved in advance by the Advisory Group and Approval Authority, and also require approval from the California Emergency Management Agency (Cal EMA). See information on change management and modifications under “D. Execution” in Section III on the project cycle above for more information.

F. Assurances and Certifications

The California Emergency Management Agency (Cal EMA) is required by law to obtain written certification of compliance. It requires the Bay Area UASI to submit the Certification of Assurance of Compliance Form. This form is a binding affirmation to comply with:

- State and federal civil rights laws;
- Drug Free Workplace Program;
- California Environmental Quality Act;
- Federal grant fund requirements;
- Lobbying restrictions;
- Debarment/suspension requirements; and
- Proof of Authority from the city council/governing board.

Similarly, the Bay Area UASI Management Team requires sub-recipient jurisdictions to sign grant assurances for the items listed above and other statements as outlined in the Appendix B (Grant Assurances) of the MOU/LOA. See template in Section VI.

G. San Francisco Procurement Process for Professional Services Contracts

In cases in which a project does not include sub-recipient funding, all procurement processes are the responsibility of the Bay Area UASI Management Team Project Lead, working in partnership with the Grants Management Unit. In such instances, procurement is conducted per the policies and procedures of the City and County of San Francisco as the Bay Area UASI fiscal agent. The procurement policies and procedures of the City and County of San Francisco must also be followed when the sub-recipient of a grant award is the City and County of San Francisco.

These general rules apply under San Francisco’s procurement process for professional services contracts:

- ***Contract amount of \$0 - \$10,000*** – No solicitation is required. However, grant guidelines require some type of comparative pricing.

- **Contract amount over \$10,000 but less than \$100,000** – Informal solicitation required. The Project Lead must informally solicit for bids. Ideally, at least three bids should be collected and evaluated by the Project Lead.
- **Contract amount of \$100,000 or more** – Formal solicitation is required. The Project Lead must follow the rules and procedures of a formal solicitation process as described next.

In cases in which a project is following San Francisco procurement policies and procedures, when a contract amount is \$50,000 or more, the Bay Area UASI Management Team must seek review and approval from the San Francisco Civil Service Commission.

- **RFP (Request for Proposals)** – An RFP process evaluates specific proposals that perform a specific service. The highest scoring proposal wins the opportunity to negotiate a contract.
- **RFQ (Request for Qualifications)** – An RFQ evaluates qualifications (e.g., resumes, reference, etc.) to establish whether proposers are qualified to perform the requested services and establishes such qualifications for a limited duration of two years. During this time, the City and County of San Francisco may enter into contract negotiations with any qualified firm for services specified within the original RFQ.

The Bay Area UASI Management Team, on behalf of the City and County of San Francisco, will advertise the RFP/RFQ opportunity, and once proposals are submitted, the Management Team will convene a review and rank panel comprised of subject matter experts to evaluate and vet the proposals. The panel will choose the best respondent and then the Project Lead will lead negotiations with the winning respondent to develop the professional services contract. See “Approval of Vendor Solicitations and Contracts” under “C. Planning” in Section III on the project cycle above for detail on requirements that must be met in the solicitation, selection, and negotiation/contract stage of contract development.

All vendors who do business with the City and County of San Francisco must also obtain a vendor number, submit a W-9, and provide a P-25 Business Tax Declaration. They must also meet the City’s Equal Benefits Ordinance, Minimum Compensation Ordinance, and Healthcare Accountability Ordinance.

In the City and County of San Francisco, a sole source request can be made to the Office of Contract Administration/Purchaser’s Office if any of the following apply:

- The commodity or service is only available from one source;
- There is only one vendor willing to enter into a contract with San Francisco;
- The item has design and/or performance features that are unique and essential to San Francisco’s needs; and/or
- The product is a licensed or patented good or service that limits its availability.

An approval from the State is required for sole source processes using federal funds administered by the Bay Area UASI.

H. Federal Procurement Guidelines

When a jurisdiction is the sub-recipient of award funds, the sub-recipient is responsible for procurement processes and should use their own procurement procedures and regulations, provided these conform to applicable federal law and standards. Sub-recipient jurisdictions are responsible for reviewing Title 44 on Emergency Management and Assistance in the Code of Federal Regulations (CFR) to confirm consistency.

Section 13.36 of Title 44 highlights the following due diligence requirements when procuring commodities/services with federal funds:

- Reasonable cost/price analysis must be conducted;
- Encourages the use of federal excess and surplus property;
- Reach out to Minority/Women Enterprise;
- No geographical preference;
- Maintain full and open competition;
- Do not preclude vendors or conduct restrictive competition;
- Maintain written code of contracting standards;
- Process for hearing protests and disputes;
- No conflict of interest in selection process; and
- Maintain records to detail the history of procurement.

Section 13.36 also identifies four different types of procurement processes:

- 1) Procurement by small purchase procedures are relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than \$100,000.
- 2) Procurement by sealed bids are when bids are publicly solicited and awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in prices.
- 3) Procurement by competitive proposals involves a method for evaluating all proposals and awarding to the firm whose proposal is most advantageous to the program, with price and other factors considered.
- 4) Procurement by non-competitive proposals (sole source) may be used when the item is only available from a single source, is a public emergency, the grantor authorizes a noncompetitive process, or after solicitation from a number of sources, competition is determined inadequate.

V. FINANCIAL MANAGEMENT

The City and County of San Francisco serves as the fiscal agent for the Bay Area UASI. A resolution passed by the City and County of San Francisco recognizes this role as fiduciary. San Francisco's Board of Supervisors is responsible for approving the formal "accept and spend" processes for the grants managed under the UASI governance structure. This role allows the Bay Area UASI Management Team, functioning as a separate arm of the San Francisco Department of Emergency Management, to execute projects with the upfront financial support of the City and County of San Francisco with reimbursement coming back to the City and County. The San Francisco Controller's Office, City Attorney's Office, and Office of Contracts Administration provide fiscal, legal, and contract program support to the Bay Area UASI.

The Bay Area UASI Management Team's Grants Management Unit has responsibility for financial management of federal funds received by the Authority. The Grants Management Unit is responsible for the administration of federal grant awards to ensure compliance with federal laws, regulations, executive orders, OMB circulars, departmental policy, award terms and conditions, and state and local requirements. The Grants Management Unit must also make certain all activities carried out under the Bay Area UASI grant program are reasonable and allowable, and maintain complete and accurate records of all program activities.

A. Grant Award

A grant award letter, when signed by the Director or designee of the California Emergency Management Agency (Cal EMA), becomes a "Grant Award" which contains the terms and conditions of the grant. The Grant Award Letter is an agreement between Cal EMA and the Bay Area UASI. All projects funded from the Grant Award must conform to the agreement as specified. Failure to do so may result in the withholding or disallowance of grant payments on current or future Cal EMA grants, the reduction or termination of the Grant Award, and/or the denial of future Grant Awards. The Bay Area UASI must comply with all applicable federal/state laws and regulations.

B. Post-Award

As a condition of accepting federal funding, the Bay Area UASI is required to maintain an accounting system and financial records to accurately account for awarded funds. These records include both federal funds and all appropriate matching funds. The Bay Area UASI Management Team, through its Grants Management Unit, is responsible for all aspects, including proper accounting and financial recordkeeping by all sub-recipients. Responsibilities include: the accounting of receipts and expenditures, cash management, maintenance of adequate financial records, and refunding expenditures disallowed by audits.

Accounting Responsibilities

The Bay Area UASI Grants Management Unit and sub-recipient jurisdictions have the following accounting responsibilities:

- ***Reviewing Financial Operations*** – The Grants Management Unit must be familiar with, and periodically monitor, its sub-recipients’ financial operations, records, systems, and procedures. Particular attention is directed to the maintenance of current financial data.
- ***Recording Financial Activities*** – The Grants Management Unit and sub-recipients must record in summary form the sub-recipient’s award or contract obligation as well as cash advances and other financial activities. Sub-recipients should record expenditures or evidence them by report forms duly filed to the Grants Management Unit. Non-federal contributions applied to programs or projects by sub-recipients should likewise be recorded by sub-recipients, as should any program income resulting from program operations. All financial records must validate expenditures related to the respective sub-recipient grant(s).
- ***Budgeting and Budget Review*** – The Grants Management Unit must ensure that each sub-recipient prepares an adequate budget on which its award commitment will be based. The detail of each project budget should be maintained on file by both the sub-recipient and the Grants Management Unit.
- ***Accounting for Non-federal Contributions*** – The Grants Management Unit and sub-recipients must ensure that the requirements, limitations, and regulations pertinent to non-federal contributions are applied.
- ***Audit Requirements*** – The Grants Management Unit must ensure that sub-recipients have met necessary audit requirements.
- ***Reporting Irregularities*** – Sub-recipients must promptly notify the Bay Area UASI Management Team, who in turn will notify the state and the federal cognizant audit agency, of any illegal acts or irregularities and of proposed and actual actions, if any.

Illegal acts and irregularities include conflicts of interest, falsification of records or reports, and misappropriation of funds or other assets. Should the Bay Area UASI Management Team become aware of any criminal activity related to federal assistance, these criminal acts should be reported to the appropriate law enforcement agency.

- ***Debarred and Suspended Organizations*** – The Bay Area UASI and its sub-recipients must not award or permit any award at any level to any party that is debarred or suspended from participation in federal assistance programs.
- ***Bonding*** – The Bay Area UASI may require adequate fidelity bond coverage where the sub-recipient lacks sufficient coverage to protect the federal government interest (see OMB Circular A-110, Subpart C, paragraph 21© and OMB Circular A-122).

Grant Accept and Expend

For grants that are not included in the City and County of San Francisco’s Annual Appropriation Ordinance (AAO) or gifts in amounts of \$10,000 or greater, special grant accept and expend processes must be followed in order to obtain spending authority from the San Francisco Board of Supervisors. In such circumstances, the Bay Area UASI must submit an Accept and Expend Resolution or an ordinance amending the San Francisco Annual Salary Ordinance (ASO) if new positions are being created.

Financial System and Structure

The City and County of San Francisco’s Financial Accounting and Management Information System (FAMIS) provides an accounting and internal administrative control system for Bay Area UASI funds. It includes a general ledger accounting structure, subsidiary accounting records, and procedures that define how and by whom the funds are handled. Accounting records identify the receipt and the expenditure of all California Emergency Management Agency (Cal EMA) funds. The system also conforms to Generally Accepted Accounting Principles (GAAP), provides a record of the amount and disposition of all project funds, shows receipt of funds and expenditures by source (e.g., federal, state, or local), and separately identifies match funds and related expenditures.

Budgetary Controls

The Bay Area UASI Management Team utilizes the budgetary control features found in FAMIS (the City and County of San Francisco’s accounting system of record) to facilitate analysis of the budget and to ensure that separate tracking and reporting are performed properly. The system also allows accurate accounting of funds by project, sub-recipients, and categories/solution areas. These categories/solution areas are: Planning, Organization, Equipment purchase, Training, Exercises (POETE), and Management and Administration.

Obligation of Funds (Encumbrance)

Obligations (encumbrances) are a legal liability to pay, under a grant and/or contract, determinable sums for services or goods incurred during a period of performance. An encumbrance occurs when funds are set aside to pay for a particular expense. This includes, but is not limited to, amounts of orders placed, contracts and grants awarded, services received, and similar transactions that require payment during the same or a future period. The Bay Area UASI Grants Management Unit enters these into the FAMIS accounting system based on documents such as approved service contracts, Memoranda of Understanding (MOU), Letters of Agreement (LOA), or requisitions for supplies and services.

Once an encumbrance is made in the FAMIS system, the funds are committed to a specific use and are no longer available for other expenditures. However, since the goods or services have not yet been received, legally, the project does not yet owe anything to the vendor or supplier.

An encumbrance is defined by the following three characteristics:

- The expenditure is approved in the original MOU/LOA budget or a subsequent sub-grant award modification;
- A formal written order or request (i.e., requisition) is approved by the Bay Area UASI Management Team prior to the end of the grant period; and
- A purchase order/contract has been submitted to the vendor or supplier of goods or services.

Expenditure of Funds

The Bay Area UASI Grants Management Unit must make certain all activities carried out under the Bay Area UASI grant program are reasonable and allowable. All allowable UASI grant expenditures fall into one of six categories/solution areas, must support the eight National Priorities and the Bay Area and State homeland security strategies, as well as enhance regional capabilities. Typically, the Bay Area UASI Management Team has 90 days after the end of the award period to liquidate obligated funds.

To be allowable, costs must meet the following general criteria:

- Be necessary and reasonable for proper and efficient performance and administration of the sub-grant award;
- Be allocable under federal and/or state provisions;
- Be authorized or not prohibited under federal, state or local laws or regulations;
- Conform to any limitations or exclusions set forth in applicable federal cost principles, federal laws, terms and conditions of the award, or other governing regulations as to types or amounts of cost items;
- Be consistent with policies, regulations, and procedures that apply uniformly to both federal awards and other activities of the governmental unit;
- Be accorded consistent treatment;

- Be determined in accordance with Generally Accepted Accounting Principles (GAAP);
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federal award in either the current or a prior period, except as specifically provided by federal law or regulation;
- Be the net of all applicable credits; and
- Be adequately documented.

Personnel Costs and Functional Timesheets

Salaries and benefits of personnel involved in more than one sub-recipient grant award/grant project must be charged to each based on the actual percentage of time spent. The annualized actual percentage charged for a particular position (e.g., Exercises Director) cannot exceed the annual percentage approved in the award. Similarly, the dollar amount charged for a particular position also must not exceed the dollar amount in the approved award or subsequent award modification.

Functional timesheets or an allocation plan must be maintained which support the time charged to grants. All grant-funded personnel must maintain time cards/sheets that indicate, on a daily basis, the actual time worked on each project and account for all the time worked by the employee during the pay period. Time cards/sheets must be signed by the employee and their supervisor. An allocation plan may also be used to allocate salaries and benefits for individuals who work on more than one project/sub-recipient grant.

Reimbursement

The UASI grant program is a reimbursement-based grant, meaning the grantee (State), sub-grantee (Bay Area UASI), and sub-recipient (regional and local jurisdictions) must first expend their funds prior to seeking reimbursement. The sub-recipient will first expend their local general funds to pay for pre-approved and allowable UASI grants program expenses and then submit a request for reimbursement from the Bay Area UASI Grants Management Unit. Once the sub-recipients have been paid, the Grants Management Unit will seek reimbursement from the California Emergency Management Agency (Cal EMA).

The Grants Management Unit will reimburse sub-recipients within 30 business days as long as supporting documentation is complete and compliant. Partial reimbursements will be remitted if supporting documentation is not sufficient. The sub-recipient must submit requested supporting documentation within 45 business days of the final deadline for claims. If the documentation is not submitted within this period, the sub-recipient may not be reimbursed. Although reimbursement requirements vary by grant source, generally, the following documentation is required of sub-recipients for a claim to be accepted and processed:

- Invoice from sub-recipient which summarizes expenses by solution area.
- Copies of all invoices received and paid by sub-recipient.

- Copies of all payments made by sub-recipient (checks issued, electronic payment).
- Copies of all requisitions and purchase orders.
- A list of the serial number or local ID tag numbers for all equipment items and their deployed location.
- ***For personnel costs*** – copies of payroll records verifying hourly rate, overtime/backfill rate, and benefits. All hours worked and charged to the sub-recipient grant award must be recorded on a functional timesheet. In addition, sample work product must be submitted with each request for reimbursement.
- ***For training expenses*** – copies of certificate of completion or class roster signed by the instructor to verify attendance and copies of all receipts for tuition, travel, lodging, and per diem expenses.
- ***For exercise expenses*** – copies of the After Action Report (AAR) and verification that it was posted on the portal within 60 days of the exercise, if applicable.
- ***If applicable*** – copies of quotes, proposals, contracts and contract amendments, procurement history, deliverables, and photographs of equipment with serial numbers pre- and post- installation.
- Final reimbursement requests must be accompanied by the work product developed using the funds.

See Section VI for a reimbursement template for sub-recipients.

Reporting

Reporting requirements must be met throughout the life of all sub-grant awards. The California Emergency Management Agency (Cal EMA) utilizes grant tools such as the Financial Management Forms Workbook (FMFW) and Biannual Strategy Implementation Reports (BSIR) to accomplish reimbursement requests and other reporting requirements from the Bay Area UASI.

The Financial Management Form Workbook is a living document used for different grant programs as a resource for completing the Grants Reporting Tool required by the Federal Emergency Management Agency (FEMA). It also serves as a tool for the Bay Area UASI Management Team's portfolio analysis and tracking. This form consists of equipment inventory and organization, training, planning, exercise, and match rosters.

The Bay Area UASI is responsible for providing updated obligation and expenditure information on a semi-annual basis to Cal EMA for the Semi Annual Progress Report, or SAPR. The applicable State Administrative Agents (SAAs) are responsible for completing and submitting the final BSIR reports which are a component of the SAPR. The BSIR submission satisfies the narrative requirement of the SAPR. The BSIR is due within 30 days after the end of the reporting period (July 30 for the reporting period of January 1 through June 30; and January 30 for the reporting period of July 1 through December 31). The Bay Area UASI Grants Management Unit must provide updated obligations and expenditure information with the BSIR to show progress made toward meeting strategic goals and objectives. Failure to submit a single BSIR report may result in a notification letter of delinquency to the San Francisco Board of Supervisors and the possible reduction of future funding awards by 10%. Additionally, the UASI risks having a hold placed on pending reimbursements.

Grants Reconciliation

Reconciliation is the process of bringing invoices, reports, and cash requests into balance with revenue and expenditure as of a particular period of time in FAMIS (the City and County of San Francisco's accounting system of record). The Bay Area UASI Grants Management Unit staff performs procedures that verify balances and transactions in FAMIS against supporting documentation such as vouchers, invoices, payroll records, etc. to comply with grant fiscal requirements. In addition to reviewing the Financial Management Form and analyzing grant budgets, grants staff is also responsible for:

- Quarterly reconciliation of grants and responding to inquiries from the City and County of San Francisco Controller's Office; and
- Annual reconciliation of federal expenditures by CFDA (Catalog of Federal Domestic Assistance) number in compliance with Single Audit requirements.

Audit

Each year the Controller's Office of the City and County of San Francisco conducts a Single Audit by an independent CPA firm in which select UASI sub-grant awards are reviewed. This is in accordance with the requirements for audit established by the Federal Office of Management and Budget (OMB) Circular A-133, to safeguard California Emergency Management Agency (Cal EMA) assets, and to ensure accounting for all grant funds. The Management Team is required to forward a copy of the audit report to Cal EMA within nine months after the fiscal year of the grant ending date. All sub-recipients of UASI sub-grant awards must maintain appropriate records to document grant compliance and are subject to audit by representatives of Cal EMA, the State of California, and the United States Government.

C. Sub-recipient Financial Monitoring

A key component of post award financial management is sub-recipient monitoring. The Bay Area UASI Grants Management Unit is responsible for monitoring sub-recipients to determine:

- Effectiveness and efficiency of operations;
- Reliability of reporting and recordkeeping; and
- Compliance level.

The Grants Management Unit utilizes both desk-based reviews and on-site visits to monitor sub-recipients. Monitoring involves review and analysis of financial, programmatic, performance and administrative issues relative to sub-grant awards, and identifies areas where technical assistance and other support may be needed.

Desk-based

The Grants Management Unit reviews all transactions through a desk review prior to processing reimbursement requests to ensure compliance with federal regulations and the terms and conditions of the Memoranda of Understanding (MOU) with sub-recipient jurisdictions. Desk-based financial monitoring can result in the identification of exceptions and potential issues related to a sub-recipient's administration of grant funds. Examples of potential issues include financial reporting anomalies, inaccurate expenditure reporting, or a misunderstanding of or non-compliance with federal cash management requirements. Desk reviews provide high-level assurance for grants financial monitoring in which the Grants Management Unit can centrally collect and analyze information to assess a sub-recipient's capacity to manage federal funds.

On-site

The Bay Area UASI Grants Management Unit conducts site visits led by grants managers in conjunction with Management Team project leads. The purpose of these visits is to assess the sub-recipient's capability, performance, and compliance in regards to the applicable elements that make up each sub-recipient grant. This includes administrative regulations and public policy requirements, as well as terms and conditions contained in the MOU with recipient jurisdictions. The goal of on-site financial monitoring activities is to ensure that sub-recipients possess adequate policies, processes, and systems to manage federal grant awards and to guard against fraud, waste, or mismanagement of funds. On-site financial monitoring activities involve collecting and analyzing information on the business functions and grant administration practices of the sub-recipients, including verification of equipment purchased with grant funds. Through these reviews, the Grants Management Unit assesses the sub-recipients' capacity to administer grants in compliance with federal regulations and evaluate sub-recipient performance in grant administration areas.

Sub-recipient Responsibilities

In terms of sub-recipient financial monitoring, sub-recipient responsibilities include carrying out all terms and conditions of their MOU and maintaining complete and accurate records of all program activities. These records must be made available to the Bay Area UASI Management Team for monitoring purposes. The sub-recipient jurisdiction is also responsible for cooperating in monitoring processes, including resolving any monitoring findings (i.e., findings of non-performance or non-compliance) in a timely manner by a corrective action plan and/or technical assistance in association with Grants Management Unit staff.

Steps in the On-Site Financial Monitoring Review

To assist the sub-recipient in preparing for the monitoring visit, the Grants Management Unit provides to the sub-recipient jurisdiction a list of documents that will be reviewed, a description of the process, and the standards to which they must comply.

There are seven steps to an on-site financial monitoring review:

- 1) ***Pre-visit Notification Letter*** – The Grants Management Unit begins the monitoring process by emailing the sub-recipient a formal pre-visit notification letter informing the sub-recipient when the monitoring visit will take place, which is usually done over a period of one to four days depending on the period(s) being monitored. The pre-visit letter explains the purpose of the visit, the process that will take place during the visit, and includes a document request list highlighting items that the sub-recipient must have available for the Grants Manager at the start of the visit. The letter also includes the name and contact information for the Grants Manager(s) who will conduct the monitoring.
- 2) ***Field Document*** – The Grants Manager emails the sub-recipient a field document at least four weeks prior to the monitoring visit. This field document reflects the scope of the monitoring review and guides the Grants Manager in deeming the level of compliance.
- 3) ***Entrance Conference*** – The Grants Manager conducts an entrance conference at the beginning of the monitoring visit with the Authorized Agent or other top official of the organization to make sure the sub-recipient has a clear understanding of the purpose, scope, and schedule of the monitoring.
- 4) ***Documentation Review and Data Analysis*** – The Grants Manager keeps a record of the information reviewed and conversations held with the sub-recipient during the monitoring visit. The documentation reviewed and obtained serves as the basis for conclusions drawn from the visit.

- 5) ***Exit Conference*** – The Grants Manager meets again with key representatives of the sub-recipient at the conclusion of the monitoring visit to:
 - Present preliminary results of the monitoring visit;
 - Provide an opportunity for the sub-recipient to secure any additional, requested documentation;
 - Explain the Monitoring Report, which may include areas of non-compliance or non-performance noted during the visit; and
 - Explain the corrective action plan process or provide technical assistance (if applicable).

- 6) ***Monitoring Report*** – Within four to six weeks after the monitoring visit, the Grants Manager provides the sub-recipient with a formal narrative report of the results of the monitoring review. The Monitoring Report creates a permanent record of what was found during the review. It points out areas for improvement as well as recognizes successes. In addition, the letter outlines any findings of non-compliance identified during the visit and the corrective action required to be in compliance.

- 7) ***Corrective Action Plan*** – If the Monitoring Report notes findings and corrective action requirements, the sub-recipient must provide to the Grants Management Unit a detailed corrective action plan within 180 days of the date of the Monitoring Report. The Plan must detail the corrective action steps the sub-recipient has undertaken, or will undertake, in addressing the noted areas of non-compliance or non-performance. If additional time is needed, a request for an extension must be submitted in writing 15 business days prior to the end of the 180 day period and approved by the Grants Manager.

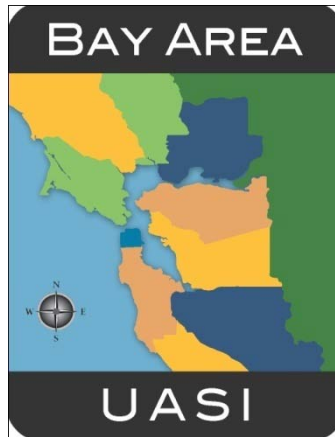
D. Grant Closeout

The Grants Management Unit will work with sub-recipient jurisdictions and the Management Team Project Lead to make sure grant closeout is timely and complete. The closeout of a grant is the process by which the California Emergency Management Agency (Cal EMA) determines that all applicable administrative actions and all required work of the grant have been completed by the Bay Area UASI. Once the close out process is achieved, revenues should match expenditures and all general ledger accounts should be cleared in FAMIS, the City and County of San Francisco budget and accounting system. Sub-recipient jurisdictions are required to retain all documentation related to project implementation and expenses reimbursed under the Bay Area UASI for a period of three years after the close of the grant. This retention period commences upon state notification of the final close-out of the grant.

VI. TEMPLATES

A. Proposal

BAY AREA UASI FY 2011 PROJECT PROPOSAL FORM



I. BACKGROUND INFORMATION

I.A. Requestor Contact Information	
Name	
Planning Hub	
Agency	
Position/Title	
Phone	
Fax	
Email	

I.B Project Name

--

I.C Place an X in the corresponding box(s)

<input type="checkbox"/>	This project is a new initiative.
<input type="checkbox"/>	This project is part of an ongoing initiative.
<input type="checkbox"/>	This project is for sustainment of a previously funded initiative.

I.D MISSION AREAS

Place an X in the box(s) that correspond to the mission area your project supports

Prevent	Protect	Respond	Recover	Mitigation
----------------	----------------	----------------	----------------	-------------------

I.E Description - Briefly describe exactly what the project entails and what would be accomplished by funding the project. Explain which gap(s) from the 2010 Planning Hub capabilities assessment this project will help close. Describe what, if any, existing capabilities the Hub currently has in place concerning this project such as any plans developed, training delivered or equipment purchased, etc.

--

I.E Does this Investment require new construction or renovation, retrofitting, or modification of existing structures?

Yes **No**

II. ALIGNMENT WITH THE BAY AREA HOMELAND SECURITY STRATEGY

II.A BAY AREA SECURITY GOALS AND OBJECTIVES		
<i>Check the Bay Area goal(s) that this project supports. (check one or more)</i>		
1	<input type="checkbox"/>	Develop a Regional Risk Management and Planning Program
2	<input type="checkbox"/>	Enhance Information Analysis and Infrastructure Protection Capabilities
3	<input type="checkbox"/>	Strengthen Communications and Interoperable Communications
4	<input type="checkbox"/>	Strengthen Chemical, Biological, Radiological, Nuclear, and Explosives (CBRNE) Detection, Response, and Decontamination Capabilities
5	<input type="checkbox"/>	Enhance Medical and Public Health Preparedness
6	<input type="checkbox"/>	Strengthen Planning and Citizen Preparedness Capabilities
7	<input type="checkbox"/>	Enhance Recovery Capabilities
8	<input type="checkbox"/>	Enhance Homeland Security Exercise, Evaluation and Training Programs

II.B List each Objective and Implementation Step (by number) from the Bay Area Homeland Security Strategy the project supports, how much funding from the project will go towards implementing each Objective, and explain how the project supports the Objective by enhancing capabilities. If more than one Objective is impacted by the project, separate total project funding among the two or more Objectives impacted.			
OBJECTIVE	IMPLEMENTATION STEP(S)	FUNDING ALIGNED TO OBJECTIVE	HOW THE PROJECT SUPPORTS IMPLEMENTATION OF THE OBJECTIVE

III. FUNDING

III.A Provide the proposed funding amount to be obligated from this Investment towards Planning, Organization, Equipment, Training, and Exercises (POETE) elements. (Please check the appropriate box(es) on the left side for all that apply). Also, for each funding area selected, provide a brief narrative below describing the items or services being funded.

ELEMENT		PROPOSED FUNDING
<input type="checkbox"/>	Planning	\$
<input type="checkbox"/>	Organization	\$
<input type="checkbox"/>	Equipment	\$
<input type="checkbox"/>	Training	\$
<input type="checkbox"/>	Exercises	\$
TOTAL PROJECT COSTS		\$

If applicable, provide the proposed funding amount from the project that can be obligated towards Law Enforcement Terrorism Prevention Activities (LETPA) funding.

\$

Planning

Organization

Equipment. List the equipment and the Authorized Equipment List number from the www.rkb.us website

--

Training

--

Exercises

--

III. B Other Source(s) of funding that is being requested or utilized for this project
(check the appropriate box(es) on the left side)

FUNDING SOURCE		PROPOSED FUNDING
<input type="checkbox"/>	SHSP	\$
<input type="checkbox"/>	CCP	\$
<input type="checkbox"/>	MMRS	\$
<input type="checkbox"/>	General Funds	\$
<input type="checkbox"/>	Other Grant Funds	\$
TOTAL OTHER FUNDING		\$

Other Funds: Explain how any non-UASI funds, such as general funds, SHSP, ASPR grants, etc., will be used to implement this project.

--

IV. Project Management and Implementation

IV.A Identify up to ten milestones, with start and end dates, which will be achieved within the three-year period of performance under the FY 11 UASI grant. No start date should begin before January 1, 2012 and no end date should end after September 30, 2014.

MILESTONE NUMBER	MILESTONE NAME/DESCRIPTION (1,000 CHARACTER LIMIT)	START DATE (MM/DD/YYYY)	END DATE (MM/DD/YYYY)
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

IV.B Project Outcomes: Describe the outcomes and benefits that will be achieved as a result of this project. The outcomes should demonstrate improvement towards building capabilities.

IV. Funding Plus Up

This section is only to be filled out in the event the Planning Hub receives additional FY 2011 UASI funding beyond the original target allocation set forth in this interim guidance. This section is to be used as part of the original project outlined in the project template above in the event such additional funds are to be added to an existing project. Any new projects funded by such additional funds must have their own fully filled-out project template.

III.A Provide the proposed additional UASI funding amount to be obligated towards this Investment - Planning, Organization, Equipment, Training, and Exercises (POETE) elements. (Please check the appropriate box(es) on the left side for all that apply). Also, for each additional funding area selected, provide a brief narrative below describing the items or services being funded.

ELEMENT		PROPOSED FUNDING
<input type="checkbox"/>	Planning	\$
<input type="checkbox"/>	Organization	\$
<input type="checkbox"/>	Equipment	\$
<input type="checkbox"/>	Training	\$
<input type="checkbox"/>	Exercises	\$
TOTAL ADDITIONAL COSTS		\$

If applicable, provide the proposed additional funding amount from the project that can be obligated towards Law Enforcement Terrorism Prevention Activities (LETPA) funding.

\$

Planning

Organization

Equipment. List the equipment and the Authorized Equipment List number from the www.rkb.us website

Training

Exercises

B. Project Plan



Project Plan Template

Project Name:		Date of Document:	
Program/ Investment Area:		Project Lead:	
Sub-recipient Jurisdictions:	1. 2. 3.	Project Start and End Dates:	
Technical Working Group:		Budget Amount:	

I. Project Plan Document History

Note here if the current plan is an update to a previously approved plan. The notation should include the date and reason for the update. It is not necessary to provide a history of drafts; only approved plans.

Version	Date approved	Reason for update

II. Goals and Rational – (maximum one page)

- *Project Goals*
- *Problem Definition*
- *Project Linkage to Bay Area Homeland Security Strategy*
- *Project Origin and Evolution*

III. Project Outcomes and Requirements – (maximum one page)

Describe the outcomes and benefits that will be achieved as a result of this project. The outcomes should demonstrate improvement towards building capabilities. Outcomes are the changes that occur or the difference that is made for individuals, groups, organizations, systems and communities as a result of the project. Outcomes express the result that your project intends to achieve if implemented as planned. (Do not confuse outcomes with outputs, which are often deliverables (tangible and direct products or results of program activities) and which lead to desired outcomes.)

If applicable, also describe any key project requirements that are critical markers of project success. (For example: must perform safety testing to 125% of government standards, prototype must be ready for introduction at the annual training exercise, must be completed by January 1 to comply with the new regulation).

IV. Deliverables

Use this section to provide a detailed description of the project deliverable(s) and their requirements.

A deliverable is a verifiable output or result of the project and can be products, services, or processes. Projects often create multiple deliverables, where some are "intermediate" and others are "final" deliverables. The primary purpose of any project is to create deliverables, and the quality of the deliverables will in large part determine the success or failure of the project. Intermediate deliverables often correspond to project milestones, and the final deliverable corresponds to the project completion (also a milestone). It's very important to know when the project will end, and the identification of the final deliverable is the best way to articulate this. Clearly define all the expected deliverables of the project and get buy-in from users/ key stakeholders at the start so that there are no surprises at the end. Make sure that everyone knows that the project will be over when the final deliverable has been completed.

A deliverable requirement is characteristic of the project deliverable(s) that reflects user/ stakeholder needs. The term applies equally to deliverables that are products, services, or processes. The intent of all projects is to create deliverables that will in some way solve a problem for the users/ stakeholders. If the requirements do not properly or adequately describe the deliverable, it is very possible that the deliverable will not solve the problem. There are numerous examples of so-called "successful" projects that finish on time and on budget but whose deliverables do not solve the defined problems. Deliverable requirements drive project scope (work) and, therefore, have a huge influence on the project schedule and budget. A poor understanding of product requirements will lead you to create an unrealistic schedule and budget.

Work with your users and stakeholders early in the project to understand and document the deliverable requirements. Have them prioritize the requirements, and have your project team/ subject matter experts help you to estimate the level of effort needed to implement the requirements. Make sure to focus on final results, not process, and use the SMART standard (Specific, Measurable, Accurate (or Agreed to), Realistic, and Time-bound). If useful, refer to specific examples of similar deliverables from other projects to make defining the deliverable more concrete.

Start Date (sort order)	Deliverable	Requirements	Completion Date	Person responsible

V. Budget

Complete the following tables with budget information.

Solution Area	Amount (\$)	%
Planning		
Organization		
Equipment		
Training		
Exercises		
Total:		

Funding Source	Amount (\$)	%
Total:		

Sub-recipient Jurisdiction	Name of Representative	Solution Area	Deliverable	Due Date (sort order)	Amount (\$)	%
Total:						

VI. Roles, Responsibilities, and Stakeholders – (maximum one page)

Summarize the roles and responsibilities and level of effort required of the following parties, if applicable to the project. Use specific names as available.

- Bay Area UASI Project Lead
- Project Team
- Sub-recipient Jurisdictions
- Other Participating Jurisdictions
- Users
- Consultants/ Vendors
- Working Group/ Technical Experts
- Other Stakeholders

Why is this section important? Describing roles and responsibilities helps project teams to think through the best way to share responsibility as well as what is needed to make the project a success, including clearly designating people with appropriate skills and level of authority to provide needed project management and decision making. In particular, it is important to speak with participants about the level of effort that will be required on their side and from whom, and document this in the project plan. Clarifying roles and responsibilities will also help provide guidance during implementation for tasks not specified or foreseen in the project plan.

VII. Communication – optional section

Provide a summary table on project communications to help plan what information will be communicated, to whom, by whom, how often, and in what medium/format.

Description and Purpose	Owner	Medium/Format	Participants	Frequency

VIII. Risks and Mitigation – optional section

Identify risks to project goals and outcomes, and explain how the project is designed to mitigate these risks or how to devise alternative plans of action.

What are project risks? Risks are factors that are critical to the project’s success and possess some element of uncertainty. Include in your thinking on risk key assumptions you may have made in your project plan that could change.

Examples of risk include:

- Access to data and confidentiality/privacy regulations
- Workload/lack of participation
- Political developments
- Scope creep
- Potential or actual conflicts of interest

Assumption, constraints, and dependencies – You may also note key project assumptions and external dependencies in this section.

IX. Approvals

This section provides the signature area. You are not required to obtain hard copy signatures – an electronic sign off or agreement to the project plan in a meeting can suffice. However, if you do not obtain hard copy signatures, then note the sign off event (i.e., date of meeting or email) in this section.

Bay Area UASI Project Lead

Date

Sub-recipient Jurisdiction Representative

Date

Sub-recipient Jurisdiction Representative

Date

Sub-recipient Jurisdiction Representative

Date

Bay Area UASI General Manager

Date

The General Manager to check here to certify the following, if applicable:

- ___ MOU/LOA document(s) approved
- ___ Vendor solicitation approved and attached
- ___ Vendor contract approved and attached

X. Appendices

Use appendices as needed for background information or detailed breakdowns of hours/costs.

C. Impartiality/Confidentiality Statement

Department, City/County
RFP/RFQ Number and Name
PROPOSAL EVALUATION

IMPARTIALITY/CONFIDENTIALITY STATEMENT

I, the undersigned, understand that I have been asked to participate in this Request for Proposals (“RFP”)/ Request for Qualifications (“RFQ”) evaluation process as an Evaluation Panelist, non-scoring proposal screener, or non-scoring observer to assist the **City/County** in choosing the best and most responsive entities to select for contract negotiations. I understand that I must give each entity a fair and independent consideration. I understand that although I may listen to the views of other participants, the comments and decisions I make regarding each entity must reflect my own impartial judgment on that entity’s proposal.

I understand that I should not participate in this RFP/Q screening or evaluation process if I have any conflict of interest that would prevent me from exercising impartial judgment as to each entity. Accordingly, I hereby attest that to the best of my knowledge neither I, nor any member of my immediate family (including my spouse/domestic partner and dependent children):

1. Have received income or gifts within the past year from any of the entities listed below;
2. Have any ownership interest or other direct or indirect investments, other than mutual funds, in any of the entities listed below;
3. Expect or intend to seek employment or any other relationship with any of the entities listed below;
4. Have any other direct or indirect interest in any of the entities listed below that would prevent me from exercising fair and impartial judgment when I participate on this RFP screening or evaluation process.

I understand that all information concerning this screening and/or evaluation process is of a highly confidential nature. I certify that I have not discussed and will not discuss any part of the RFP/Q screening or evaluation process with anyone outside of the screening or evaluation process, including Proposers and their subconsultants, and understand that I should not do so prior to completion of Proposer selection for contract award. Upon request, the **Department Contract Manager can inform you when that has occurred.**

Proposers:

Insert names of all Proposer(s)

Signature

Date

Print Name

Title, Department or Firm

D. MOU/LOA Appendix B - Grant Assurances

Name of Jurisdiction: FULL NAME OF SUBRECIPIENT JURISDICTION

Name of Authorized Agent: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: (____) _____

Fax Number: (____) _____

E-Mail Address: _____

As the duly authorized representative of the SUBRECIPIENT, I certify that SUBRECIPIENT:

1. Will assure that grant funds will support efforts related to providing an integrated mechanism to enhance the coordination of national priority efforts to prevent, respond to, and recover from terrorist attacks, major disasters and other emergencies.
2. Has the legal authority to apply for Federal assistance and has the institutional, managerial and financial capability to ensure proper planning, management and completion of the grant provided by the U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA) and sub-granted through the State of California, California Emergency Management Agency (Cal EMA).
3. Will assure that grant funds are used for allowable, fair, and reasonable costs only and will not be transferred between grant programs (for example: State Homeland Security Program, Urban Area Security Initiative, Citizen Corps Program, and Metropolitan Medical Response System) or fiscal years.
4. Will comply with any cost sharing commitments included in the FY2010 Investment Justifications submitted to DHS/FEMA/Cal EMA, where applicable.
5. Will give the Federal government, the General Accounting Office, the Comptroller General of the United States, the State of California, the Office of Inspector General, through any authorized representative, access to, and the right to examine, all paper or electronic records, books, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards and/or awarding agency directives.
6. Agrees that funds utilized to establish or enhance State and Local fusion centers must support the development of a statewide fusion process that corresponds with the Global Justice/Homeland Security Advisory Council (HSAC) Fusion Center Guidelines, follow the Federal and State approved privacy policies, and achieve (at a minimum) baseline level of capability as defined by the Fusion Capability Planning Tool.

7. Will provide progress reports, and other such information as may be required by the awarding agency, including the Initial Strategy Implementation Plan (ISIP) within 45 (forty-five) days of the award, and update via the Grant Reporting Tool (GRT) twice each year.
8. Will initiate and complete the work within the applicable time frame after receipt of approval from Cal EMA.
9. Will maintain procedures to minimize the time elapsing between the award of funds and the disbursement of funds.
10. Will comply with all provisions of DHS/FEMA's codified regulation 44, Part 13, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, including the payment of interest earned on advances.
11. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes, or presents the appearance of, personal or organizational conflict of interest, or personal gain for themselves or others, particularly those with whom they have family, business, or other ties.
12. Understands and agrees that Federal funds will not be used, directly or indirectly, to support the enactment, repeal, modification or adoption of any law, regulation, or policy, at any level of government, without the express prior written approval from DHS/FEMA/Cal EMA.
13. Agrees that, to the extent contractors or subcontractors are utilized, will use small, minority-owned, women-owned, or disadvantaged business concerns and contractors or subcontractors to the extent practicable.
14. Will notify Cal EMA of any developments that have a significant impact on award-supported activities, including changes to key program staff.
15. Will comply, if applicable, with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of structures.
16. Will comply with all Federal and State Statutes relating to Civil Rights and Nondiscrimination. These include, but are not limited to:
 - a. Title VI of the Civil Rights Act of 1964 (P.L. 88-352), as amended, which prohibits discrimination on the basis of race, color or national origin.
 - b. Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§ 1681-1683 and 1685-1686), which prohibits discrimination on the basis of gender.
 - c. Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), which prohibits discrimination on the basis of handicaps.
 - d. The Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101-6107), which prohibits discrimination on the basis of age.
 - e. The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse.
 - f. The Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism.

- g. §§ 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records.
 - h. Title VIII of the Civil Rights Act of 1968 (42 U.S.C. § 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing.
 - i. Title 44 Code of Federal Regulations (CFR) Parts 7, 16, and 19 relating to nondiscrimination.
 - j. The requirements on any other nondiscrimination provisions in the specific statute(s) under which the application for Federal assistance is being made.
 - k. Will, in the event that a Federal or State court or Federal or State administrative agency makes a finding of discrimination after a due process hearing on the grounds or race, color, religion, national origin, gender, or disability against a recipient of funds, the recipient will forward a copy of the finding to the Office of Civil Rights, Office of Justice Programs.
 - l. Will provide an Equal Employment Opportunity Plan, if applicable, to the Department of Justice Office of Civil Rights within 60 days of grant award.
 - m. Will comply, and assure the compliance of all its subgrantees and contractors, with the nondiscrimination requirements and all other provisions of the current edition of the Office of Justice Programs Financial and Administrative Guide for Grants, M7100.1.
17. Will comply with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. § 4601 et seq. [P.L. 91-646]) which provides for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or Federally assisted programs. These requirements apply to all interested in real property acquired for project purposes regardless of Federal participation in purchases. Will also comply with Title 44 CFR, Part 25, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-assisted programs.
18. Will comply, if applicable, with the flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is ten thousand dollars (\$10,000) or more.
19. Will comply with all applicable Federal, State, and Local environmental and historical preservation (EHP) requirements. Failure to meet Federal, State, and Local EHP requirements and obtain applicable permits may jeopardize Federal funding. Will comply with all conditions placed on any project as the result of the EHP review; any change to the scope of work of a project will require reevaluation of compliance with these EHP requirements.
20. Agrees not to undertake any project having the potential to impact the EHP resources without the prior written approval of DHS/FEMA/Cal EMA, including, but not limited to, ground disturbance, construction, modification to any structure, physical security enhancements, communications towers, and purchase and/or use of any sonar equipment. The subgrantee must comply with all conditions placed on the project as a result of the EHP review. Any construction- related activities initiated without the necessary EHP review and approval will result in a noncompliance finding, and may not be eligible for reimbursement with DHS/FEMA/Cal EMA funding. Any change to the scope of work will require re-evaluation of compliance with the EHP. If ground-disturbing activities occur during the project implementation, the subgrantee

must ensure monitoring of the disturbance. If any potential archeological resources are discovered, the subgrantee will immediately cease activity in that area and notify DHS/FEMA/Cal EMA and the appropriate State Historic Preservation Office.

21. Will ensure that the facilities under its ownership, lease or supervision, which shall be utilized in the accomplishment of this project, are not on the Environmental Protection Agency's (EPAs) List of Violating Facilities, and will notify Cal EMA and the Federal Grantor agency of the receipt of any communication from the Director of the EPA Office of Federal Activities indicating if a facility to be used in the project is under consideration for listing by the EPA.
22. Will provide any information requested by DHS/FEMA/Cal EMA to ensure compliance with applicable laws, including the following:
 - a. Institution of environmental quality control measures under the National Environmental Policy Act, National Historical Preservation Act, Archaeological and Historic Preservation Act, Endangered Species Act, and Executive Orders on Floodplains (11988), Wetlands (11990) and Environmental Justice (EO12898) and Environmental Quality (EO11514).
 - b. Notification of violating facilities pursuant to EO 11738.
 - c. Assurance of project consistency with the approved state management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.).
 - d. Conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. § 7401 et seq.).
 - e. Protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (P.L. 93-523).
 - f. California Environmental Quality Act (CEQA). California Public Resources Code Sections 21080-21098. California Code of Regulations, Title 14, Chapter 3 Section 15000-15007.
 - g. Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
 - h. Applicable provisions of the Coastal Barrier Resources Act (P.L. 97-348) dated October 19, 1982 (16 USC 3501 et seq.) which prohibits the expenditure of most new Federal funds within the units of the Coastal Barrier Resources System.
23. Will comply with Standardized Emergency Management System (SEMS) requirements as stated in the California Emergency Services Act, Government Code, Chapter 7 of Division 1 of Title 2, Section 8607.1(e) and CCR Title 19, Sections 2445, 2446, 2447, and 2448.
24. Agrees that all publications created or published with funding under this grant shall prominently contain the following statement: *"This document was prepared under a grant from FEMA's Grant Programs Directorate, U.S. Department of Homeland Security. Points of view or opinions expressed in this document are those of the authors and do not necessarily represent the official position or policies of FEMA's Grant Programs Directorate or the U.S. Department of Homeland Security."* The recipient also agrees that, when practicable, any equipment purchased with grant funding shall be prominently marked as follows: *"Purchased with funds provided by the U.S. Department of Homeland Security."*

25. Acknowledges that DHS/FEMA reserves a royalty-free, nonexclusive, and irrevocable license to reproduce, publish, or otherwise use, and authorize others to use, for Federal government purposes: a) the copyright in any work developed under an award or sub-award; and b) any rights of copyright to which a recipient or sub-recipient purchases ownership with Federal support.
26. The recipient agrees to consult with DHS/FEMA/Cal EMA regarding the allocation of any patent rights that arise from, or are purchased with, this funding.
27. Has requested through the State of California, Federal financial assistance to be used to perform eligible work approved in the submitted application for Federal assistance and after the receipt of Federal financial assistance, through the State of California, agrees to the following:
 - a. Promptly return to the State of California all the funds received which exceed the approved, actual expenditures as accepted by the Federal or State government.
 - b. In the event the approved amount of the grant is reduced, the reimbursement applicable to the amount of the reduction will be promptly refunded to the State of California.
 - c. Separately account for interest earned on grant funds, and will return all interest earned, in excess of \$100 per Federal Fiscal Year.
28. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. Sections 4728-4763) relating to prescribed standards for merit systems for programs funded under one of the nineteen statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
29. Will comply with provisions of the Hatch Act (5 U.S.C. Sections 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
30. Will comply, if applicable, with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
31. Will comply, if applicable, with the Laboratory Animal Welfare Act of 1966 (P. L. 89-544, as amended, 7 U.S.C. 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
32. Will comply with the minimum wage and maximum hour provisions of the Federal Fair Labor Standards Act (29 U.S.C. 201), as they apply to employees of institutions of higher education, hospitals, and other non-profit organizations.
33. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. Section 276a to 276a-7), the Copeland Act (40 U.S.C. Section 276c and 18 U.S.C. Sections 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. Sections 327-333), regarding labor standards for Federally-assisted construction sub-agreements.

34. Agrees that:

- a. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal grant or cooperative agreement.
- b. If any other funds than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or an employee of Congress, or employee of a Member of Congress in connection with the Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
- c. The undersigned shall require that the language of this certification be included in the award documents for all sub awards at all tiers including subgrants, contracts under grants and cooperative agreements, and subcontract(s) and that all sub recipients shall certify and disclose accordingly.
- d. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

35. Agrees that equipment acquired or obtained with grant funds:

- a. Will be made available pursuant to applicable terms of the California Disaster and Civil Defense Master Mutual Aid Agreement in consultation with representatives of the various fire, emergency medical, hazardous materials response services, and law enforcement agencies within the jurisdiction of the applicant, and deployed with personnel trained in the use of such equipment in a manner consistent with the California Law Enforcement Mutual Aid Plan or the California Fire Services and Rescue Mutual Aid Plan.
- b. Is consistent with needs as identified in the State Homeland Security Strategy and will be deployed in conformance with that Strategy.

36. Agrees that funds awarded under this grant will be used to supplement existing funds for program activities, and will not supplant (replace) non-Federal funds.

37. Will comply with all applicable Federal statutes, regulations, policies, guidelines and requirements, including OMB Circulars A102 and A-133, E.O. 12372 and the current Administrative Requirements, Cost Principles, and Audit Requirements.

38. Will comply with all provisions of 2 CFR, including: Part 215 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (OMB Circular A-110); Part 225 Cost Principles for State, Local and Indian Tribal Governments (OMB Circular A-87); Part 220 Cost Principles for

Educational Institutions (OMB Circular A-21); Part 230 Cost Principles for Non-Profit Organizations (OMB Circular A-122).

39. Will comply with Subtitle A, Title II of the Americans with Disabilities Act (ADA) 1990.
40. Agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this agreement.
41. Will comply with Federal Acquisition Regulations (FAR), part 31.2 Contract Cost Principles and Procedures, Contracts with Commercial Organizations.
42. Will comply with the financial and administrative requirements set forth in the current edition of the DHS Financial Management Guide.
43. Agrees that all allocations and use of funds under this grant will be in accordance with the FY 2010 Homeland Security Grant Program Guidance and Application Kit, and the California Supplement to the FY 2010 Homeland Security Grant Program Guidance and Application Kit. All allocations and use of funds under this grant will be in accordance with the Allocations, and use of grant funding must support the goals and objectives included in the State and/or Urban Area Homeland Security Strategies as well as the investments identified in the Investment Justifications which were submitted as part of the California FY2010 Homeland Security Grant Program application. Further, use of FY10 funds is limited to those investments included in the California FY10 Investment Justifications submitted to DHS/FEMA/Cal EMA and evaluated through the peer review process.
44. Will not make any award or permit any award (subgrant or contract) to any party which is debarred or suspended or is otherwise excluded from or ineligible for participation in Federal assistance programs under Executive Order 12549 and 12689, "Debarment and Suspension".
45. As required by Executive Order 12549, Debarment and Suspension, and implemented at 44 CFR Part 17, for prospective participants in primary covered transactions,
 - a. The applicant certifies that it and its principals:
 - i. Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of Federal benefits by a State or Federal court, or voluntarily excluded from covered transactions by any Federal department or agency.
 - ii. Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property.
 - iii. Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and have not

- within a three-year period preceding this application had one or more public transactions (Federal, State, or local) terminated for cause or default; and
- b. Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.
46. Agrees to comply with the Drug-Free Workplace Act of 1988, and certifies that it will or will continue to provide a drug-free workplace by:
- a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition.
 - b. Establishing an on-going drug-free awareness program to inform employees about:
 - i. The dangers of drug abuse in the workplace;
 - ii. The grantee's policy of maintaining a drug-free workplace;
 - iii. Any available drug counseling, rehabilitation, and employee assistance programs; and

The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
 - c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a).
 - d. Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will
 - i. Abide by the terms of the statement; and
 - ii. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction.
 - e. Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to:

Department of Justice, Office of Justice Programs
 ATTN: Control Desk
 633 Indiana Avenue, N.W.
 Washington, D.C. 20531

Notice shall include the identification number(s) of each affected grant.
 - f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted.
 - i. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - ii. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency.
 - g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

- 47. Will comply with all applicable requirements of all other Federal and State laws, executive orders, regulations, program and administrative requirements, policies and any other requirements governing this program.
- 48. Understands that failure to comply with any of the above assurances may result in suspension, termination, or reduction of grant funds.

The undersigned represents that he/she is authorized by the above named SUBRECIPIENT to enter into this agreement for and on behalf of the said SUBRECIPIENT.

Signature of Authorized Agent: _____

Printed Name of Authorized Agent: _____

Title: _____ Date: _____

E. MOU/LOA Appendix C - Request for Reimbursement

_____, 2011

UASI Management Team
10 Lombard Street, Suite 410
San Francisco, CA 94111

Re: FY 10 UASI Grant Reimbursement Request

Pursuant to Section 3.10 of the Agreement Between the City and County of San Francisco and the Full Name of Subrecipient for the Distribution of FY 2010 UASI Regional Funds (the "Agreement"), dated DATE, between the FULL NAME OF SUBRECIPIENT JURISDICTION ("SUBRECIPIENT") and the City and County of San Francisco, SUBRECIPIENT hereby requests reimbursement as follows:

Total Amount of
Reimbursement
Requested in this
Request: \$ _____

Maximum Amount of
Funds Specified in
Section 3.2 of the
Agreement: \$ _____

Total of All Funds
Disbursed Prior to this
Request: \$ _____

SUBRECIPIENT certifies that:

- (a) The total amount of funds requested pursuant to this Funding Request will be used to reimburse SUBRECIPIENT for Authorized Expenditures, which expenditures are set forth on the attached Schedule 1, to which are attached true and correct copies of all required documentation of such expenditures.

- (b) After giving effect to the disbursement requested pursuant to this Reimbursement Request, the Funds disbursed as of the date of this disbursement will not exceed the maximum amount set forth in Section 3.2 of the Agreement, or the not to exceed amounts specified in Appendix A for specific projects and programs.

- (c) The representations, warranties and certifications made in the Agreement are true and correct in all material respects as if made on the date hereof, and SUBRECIPIENT is in compliance with all Grant Assurances in Appendix B;

- (d) No Event of Default has occurred and is continuing; and

- (e) The undersigned is an officer of SUBRECIPIENT authorized to execute this Reimbursement Request on behalf of SUBRECIPIENT.

Signature of Authorized Agent: _____

Printed Name of Authorized Agent: _____

Title: _____ Date: _____

SCHEDULE 1 TO REQUEST FOR REIMBURSEMENT

The following is an itemized list of Authorized Expenditures for which reimbursement is requested:

Project	Payee	Amount	Description
---------	-------	--------	-------------

The following are attached as part of this Schedule 1:

- (i) An invoice for each item of expenditure for which reimbursement is requested;
- (ii) The front and the back of canceled checks or other written evidence documenting the payment of each invoice;
- (iii) For expenditures which are wages or salaries, payroll registers containing a detailed breakdown of earnings and withholdings, together with both sides of canceled payroll checks evidencing payment thereof (unless payment has been made electronically).

F. MOU/LOA Appendix A – Authorized Expenditures and Timelines

Authorized Expenditures and Timelines

ENTITY: **SUBRECIPIENT JURISDICTION**

Total allocation to be spent on the following solution areas:

<u>UASI Project Title</u>	<u>Solution Area</u>	<u>Program Description</u>	<u>Deliverable Dates</u>	<u>Amount</u>
Project LETTER	Planning	<ul style="list-style-type: none"> • Personnel – Prior to any expenditures for personnel, subrecipient must submit completed job descriptions to the UASI detailing the planning activities the personnel will complete and the deliverables to be produced. Prior to reimbursement, subrecipient must submit the following: all functional time sheets, payroll documentation showing payment of salaries and benefits, or cancelled checks; work product or certification that work was completed. • Contracts – All contracts must be pre-approved by the UASI prior to execution. In addition, subrecipient must satisfy the following guidelines: <ul style="list-style-type: none"> ○ Procurement of contractual services must follow local policies and procedures for competitive purchasing (provided they are not in conflict with Federal regulations which supersede them). ○ If subrecipient receives only one bid or only one vendor can perform the services required, a State sole source approval is need. Subrecipient must transmit a sole source request to the UASI for submission to the State. ○ The contract must have a clearly stated scope of work and deliverables, deadlines for completion of work, and a schedule of contract payments. ○ All services must be performed and paid within the grant performance period. • Travel - travel for planning activities must be pre-approved by the UASI Director of Strategy and Compliance or designee prior to scheduling. Invoices for all travel expenses must be submitted by no later than DATE. Invoices must include all backup documentation, including conference agendas, programs, brochures, lodging receipts, per diem calculations, airfare receipts/boarding passes, mileage calculations, other transportation 		

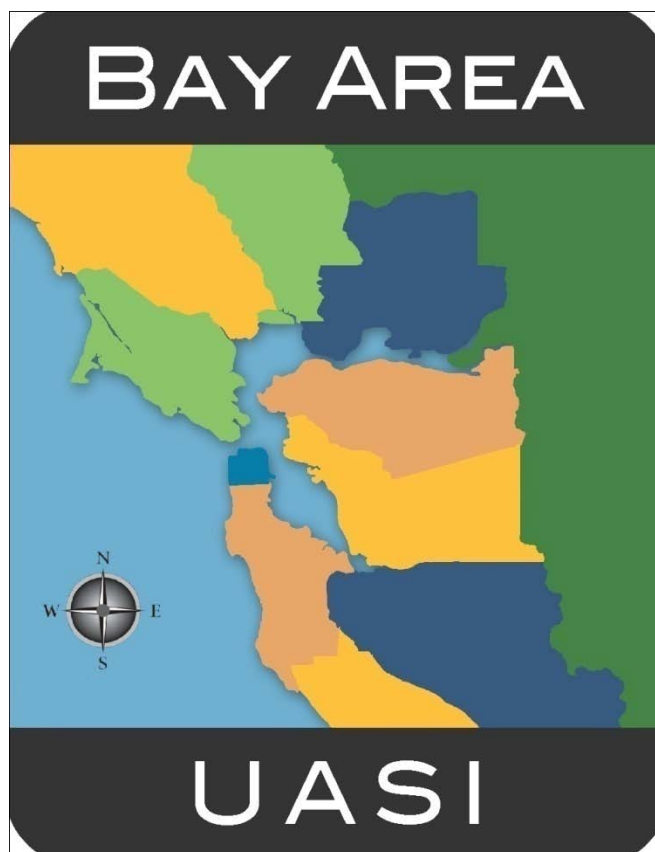
		<p>receipts, and proof of payment</p> <ul style="list-style-type: none"> Final deadline for submittal of final claims is DATE. 		
	Training	<p>Provide training.</p> <ul style="list-style-type: none"> All training courses require an approved Environmental and Historic Preservation ("EHP") memo. All expenses must be pre-approved by the UASI Director of Strategy and Compliance or designee prior to scheduling. Training course expenses may include backfill/overtime, travel, tuition, per diem or other grant eligible expenses. Grant eligible training expenses are published in the FY 2010 Homeland Security Grant Program Guidance. When seeking reimbursement for grant eligible training expenses, Subrecipient must submit completed ledger page indicating course title, feedback number, sub category (e.g., OT, BF, Course Development). Provide registration receipts and agendas. Provide copies of sign in sheets (must have supervisor's signature). Final deadline for submittal of claims is DATE. 		
	Exercise	<p>Reimbursement for exercise activities require:</p> <ul style="list-style-type: none"> An approved EHP memo Exercise expenses may include backfill/overtime, travel, exercise planning, or other ancillary expenses needed to successfully complete the exercise. Eligible exercise expenses are published in the FY 2010 Homeland Security Grant Program Guidance. An After Action Report (AAR) must be completed within 60 calendar days of the exercise. Subrecipient must submit a copy of the AAR report and proof of transmittal to the web portal with the final request for reimbursement . Final deadline for submittal of claims is DATE. 		
	Equipment	<p>Reimbursement for equipment purchases require:</p> <ul style="list-style-type: none"> An approved EHP memo As allowable under Federal guidelines, procurement of equipment must follow local policies and procedures for competitive purchasing. At a minimum, more than one quote or bid must be obtained, unless a sole source is justified. If sole source approval is needed, subreceptient must transmit the request to the UASI for request to the State. 		

		<ul style="list-style-type: none"> • Prior to reimbursement, subrecipient must submit all invoices, AEL numbers, and a list of all equipment ID numbers and the deployed locations. • Final deadline for submittal of claims is DATE. 		
	Organization	Reimbursement for organization costs require: <ul style="list-style-type: none"> • Organization charts and completed job descriptions submitted to the UASI. • Functional Timesheets • Payroll documentation showing payment of salaries and benefits, or cancelled checks. 		
		TOTAL ALLOCATION		NOT TO EXCEED:

- **All requests for reimbursements must be submitted by DATE unless an earlier deadline is set in this Appendix.**
- **Authorized expenditures must fall into one of the following categories: Planning, Organization, Equipment, Training, or Exercises. Descriptions of authorized expenditures are in the following documents:**
 - *FY 2010 Homeland Security Grant Program, Guidance and Application Kit dated December, 2009:* http://www.fema.gov/pdf/government/grant/2010/fy10_hsgp_kit.pdf
 - *California Supplement to Federal Program Guidance and Application Kit:* [http://www.calema.ca.gov/WebPage/oeswebsite.nsf/ClientOESFileLibrary/Homeland%20Security%20Files/\\$file/FY10HSGPSupplementGuidance.pdf](http://www.calema.ca.gov/WebPage/oeswebsite.nsf/ClientOESFileLibrary/Homeland%20Security%20Files/$file/FY10HSGPSupplementGuidance.pdf)
 - *Authorized Equipment List:* www.rkb.us
 - *Office of Justice Programs Financial and Administrative Guide for Grants:* <http://www.ojp.usdoj.gov/financialguide/>
- **Any equipment purchased under this Agreement must match the UASI 2010 Grant Application Workbook. Any modification to the inventory list in that Workbook must receive prior written approval from by the Bay Area UASI Program Manager.**
- **No Management and Administration expenses are allowed, unless expressly identified and authorized in this Appendix.**
- **Sustainability requirements may apply to some or all of the grant funded projects or programs authorized in this Appendix. See Agreement, 3.13, 3.14.**
- **All EHP documentation must be submitted and approved prior to any expenditure of funds requiring EHP submission.**

VII. APPENDICES

A. Proposal Implementation Guidance



Interim

**Bay Area Homeland Security Strategy
Implementation Guidance for Fiscal Year 2011**

February 2011

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Overview

In 2010, the Bay Area Urban Area Security Initiative (UASI) conducted a region-wide risk validation analysis along with capabilities assessments across the region's four Planning Hubs – North Bay, South Bay, East Bay and West Bay – the results of which were used to update the Department of Homeland Security (DHS) mandated Urban Area Homeland Security Strategy for the Bay Area UASI.

The 2011 Bay Area Homeland Security Strategy is a comprehensive data driven document that outlines the Bay Area UASI's risks, capabilities, vision, structure, goals and objectives for homeland security. Having such a strategy ensures the Bay Area is in the best possible position to clearly track and articulate its risks and capability needs to local leaders, the State of California and DHS when seeking resources to reduce that risk and satisfy those capability needs.

The following sets forth **interim** guidance for the Bay Area's four regional Planning Hubs – North, South, East and West – to implement the Bay Area Strategy in the form of homeland security projects for FY 2011. This guidance is interim due to the fact that, at this time, the FY 2011 federal DHS budget and grant guidelines have not been passed or issued. Therefore, this guidance can and likely will change once final DHS guidelines are issued.

This interim guidance is primarily centered on the DHS UASI grant program. An associated project template must be used in tandem with this guidance to develop specific projects, which shall then be submitted to the Bay Area UASI Management Team for review and submission to the State of California and ultimately to DHS. **Each Planning Hub may submit up to eight project templates to the UASI Management Team. Each of the eight project templates covers a project area and may consist of one or several sub-projects that make up the total project template.** All Planning Hub projects must meet the following criteria in order to be eligible for UASI funding:

- Have a high threat, high density urban area terrorism focus.
- Build regional capabilities (regional is defined as two or more counties) tied to regional gap analysis data.
- Enhance regional preparedness and directly support the national priority on expanding regional collaboration in the National Preparedness Guidelines.
- Align with the Bay Area Urban Area Homeland Security Strategy and demonstrate a clear correlation between the goals, objectives, and priorities identified in the Strategy.
- Support the federal investment strategy.
- Incorporate the DHS grant program funding priorities as well as the relevant national priorities.

Planning Hubs are strongly encouraged to integrate UASI, State Homeland Security Program (SHSP), Metropolitan Medical Response System (MMRS), Citizen Corps (CCP) and general funds when developing FY 2011 projects, with an understanding that the rules governing the use of those funds may vary from funding source to funding source.

UASI Grant Program Overview

Since its inception in FY 2003, the intent of the UASI program has been to enhance regional preparedness in major metropolitan areas. The UASI program is intended to assist participating

jurisdictions in developing integrated regional systems for prevention, protection, response, and recovery. Ultimately, the FY 2011 UASI program is intended to provide financial assistance to address the unique multi-discipline planning, organization, equipment, training, and exercise needs of high-threat, high-density Urban Areas, and to assist these Areas in building and sustaining capabilities to prevent, protect against, respond to, and recover from threats or acts of terrorism.

Activities implemented with UASI funds **must** support terrorism preparedness by building or enhancing capabilities that relate to the prevention of, protection from, response to or recovery from terrorism in order to be considered eligible. However, as noted in the Bay Area Strategy, many capabilities which support terrorism preparedness simultaneously support preparedness for other hazards, including natural disasters and major accidents. Planning Hubs **must** demonstrate the dual-use quality for any activities implemented that are not explicitly focused on terrorism preparedness.

Planning Hub & Major City Allocations

The Department of Homeland Security uses a risk-based formula to allocate funds under the Urban Areas Security Initiative grant program across the country. The Bay Area UASI is using a similar risk-based allocation formula at the regional level to allocate funds to the Planning Hubs.

At the time of the issuance of this interim guidance, DHS has not released the final FY 2011 grant guidance. Therefore, the Bay Area does not know the actual amount of funding the region will receive in FY 2011. However, for planning purposes, the region will assume a level of FY 2011 funding roughly equal to the amount actually received by the region in FY 2008. If and when the final FY 2011 allocation is announced, the Bay Area will adjust its regional allocations accordingly. Therefore, Planning Hubs should **not** assume that funding allocations listed in this interim guidance are final. The funding levels outlined herein are very likely to change.

The **interim allocations** by Planning Hub are as follows:

North Bay	\$1,137,028
South Bay	\$4,819,485 (of which \$1 million is allocated to San Jose)
East Bay	\$3,637,741 (of which \$1 million is allocated to Oakland)
West Bay	\$7,599,594 (of which \$1 million is allocated to San Francisco)

The three major cities of San Francisco, San Jose and Oakland will each receive \$1 million allocations that will be included in the total allocation to each of the Planning Hubs of which they are a part. Thus, the \$1 million major city allocation is **not** in addition to what the Planning Hub in which that major city is located receives in funding. This \$1 million allocation is intended to be used for the major city, but is expected to be vetted through the Planning Hub process to ensure it will be used for regional benefit. The \$1 million **must** have a UASI project template, or set of templates as the case may be, that accounts for the entire amount.

In the event a Planning Hub is unable or unwilling to fully allocate its UASI funding allocation it shall immediately notify the Bay Area UASI Management Team, which shall re-allocate such funding to one or more of the other Planning Hubs using the risk based formula.

Planning Hub Workshops

The Bay Area UASI Management Team will host a series of Planning Hub workshops to review this Strategy Implementation Guidance, the FY 2011 project template and Planning Hub projects. These workshops will occur in each of the Planning Hubs and will be held March, 2nd, 3rd and 4th and April 5th, 6th, 7th and 8th. The dates in April are subject to change and may be held earlier because of Congressionally set deadlines that are outside the control of the Bay Area UASI.

Submission Dates and Times

Project Templates from the four Planning Hubs must be received by the UASI Management Team by **5:00 p.m. PDT on Friday, March 25, 2011.**

Management and Administration (M&A)

Management and Administration expenses are **not** allowable for the Regional Planning Hubs or the three major cities.

Allowable Spending Areas

The following is a summary of allowable spending areas for FY 2011 under the UASI program as it pertains to the Bay Area UASI. Unless stated otherwise, this guidance supersedes any other guidance issued by DHS for purposes of the UASI grant program in the Bay Area. If Planning Hubs have questions regarding allowable cost items they should contact the Bay Area UASI Management Team for clarification.

The spending areas are broken out largely under the planning, organization, equipment, training and exercises (POETE) spending areas. This matches the Bay Area Strategy, which also divides recommended spending areas under POETE for each objective in the Strategy, as well as the DHS mandated budget sections for Investment Justifications that the Bay Area must submit in order to receive DHS funding.

The spending areas below simply outline what is allowable. They are not a list of what Planning Hubs should or must purchase. Rather, the spending areas in this guidance must be viewed in the context of the Bay Area Homeland Security Strategy's goals and objectives. The spending areas serve as a guide for what Planning Hubs can purchase in their efforts to implement the Bay Area Strategy, which is the document that should drive Planning Hub expenditures.

The following are definitions for the terms as used in this interim guidance:

- **Hiring** –Planning Hubs may use grant funding to cover the salary of newly hired personnel who are exclusively undertaking allowable DHS/FEMA program activities as specified in this guidance. This may not include new personnel who are hired to fulfill any non-FEMA program activities under any circumstances. Hiring will always result in a net increase of Full Time Equivalent (FTE) employees.

- **Overtime** – These expenses are limited to the additional costs which result from personnel working over and above 40 hours of weekly work time as a direct result of their performance of FEMA-approved activities specified in this guidance. Overtime associated with any other activity is not eligible.
- **Backfill-related Overtime** – Also called “Overtime as Backfill,” these expenses are limited to overtime costs which result from personnel who are working overtime (as identified above) to perform the duties of other personnel who are temporarily assigned to FEMA-approved activities outside their core responsibilities. Neither overtime nor backfill expenses are the result of an increase of FTE employees.
- **Supplanting** – Grant funds will be used to supplement existing funds, and shall not replace (supplant) funds that have been appropriated for the same purpose. Applicants or grantees may be required to supply documentation certifying that a reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

Planning Activities

Planning Hubs may use FY 2011 UASI funds for planning efforts that enable them to prioritize needs, build capabilities, update preparedness strategies, allocate resources, and deliver preparedness programs across disciplines (e.g., tribal governments, law enforcement, fire, EMS, health care systems, public health, behavioral health, public works, water associations, agriculture, and information technology) and levels of government. Planning activities should focus on the four homeland security mission areas of prevention, protection, response, and recovery. Planning activities include, but are not limited, to:

- Developing hazard/threat-specific annexes that incorporate the range of prevention, protection, response, and recovery activities
- Developing and implementing homeland security support programs and adopting ongoing DHS national initiatives
- Developing related terrorism prevention activities
- Developing and enhancing plans and protocols
- Developing or conducting assessments
- Hiring of full- or part-time staff or contract/consultants to assist with planning activities (not for the purpose of hiring public safety personnel fulfilling traditional public safety duties)
- Conferences to facilitate planning activities
- Materials required to conduct planning activities
- Travel/per diem related to planning activities
- Overtime and backfill costs (in accordance with operational Cost Guidance)
- Other planning activities with prior approval from the Bay area UASI Management Team

Personnel Activities

Personnel hiring, overtime, and backfill expenses are permitted under the UASI grant in order to perform allowable FY 2011 HSGP planning, organization, equipment, training, and exercise activities.

A personnel cost cap of up to **15 percent** of each Planning Hub’s total allocation may be used for personnel and personnel-related activities as directed by the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act* (Public Law 110-412). **Any personnel expenses proposed within the \$1 million major city allocation to the cities of San Francisco, San Jose and Oakland must be counted toward the 15 percent personnel cap for the entire Planning Hub of which each city is a part.** The use of UASI funding to pay for staff and/or contractor regular time or overtime/backfill is considered a personnel cost. Activities that are considered “personnel” and “personnel-related,” count against the personnel cost cap of 15 percent, include, but are not limited to:

- Operational overtime
- Overtime/backfill to participate in approved training or exercise deliveries
- Salaries and personnel costs of intelligence analysts
- Overtime to participate in intelligence sharing activities
- Salaries and personnel costs of planners, equipment managers, exercise coordinators, and/or training coordinators
- Salaries and personnel costs under the M&A category
- Contractor costs associated with performing all of the above activities

FY 2011 UASI funds **may not** be used to support the hiring of any personnel for the purposes of fulfilling traditional public health and safety duties or to supplant traditional public health and safety positions and responsibilities.

Organizational Activities

Section 2008 of the *Homeland Security Act of 2002*, as amended by the 9/11 Act, includes the following allowable organizational activities:

- Responding to an increase in the threat level under the Homeland Security Advisory System, or needs resulting from a National Special Security Event
- Establishing, enhancing, and staffing State and Major Urban Area fusion centers
- Paying salaries and benefits for personnel to serve as qualified intelligence analysts

Planning Hubs must justify proposed expenditures of UASI funds to support organizational activities within their project submission by using historical data or other analysis. A personnel cost cap of up to **15 percent** of each Planning Hub’s total allocation may be used for personnel and personnel-related activities. All Planning Hubs are allowed to utilize up to **15 percent** of their FY 2011 UASI funds towards organizational activities. Any organizational expenses incurred must be counted toward the total 15 percent personnel cap for each Planning Hub. Organizational activities are broken down into the following three major categories:

Intelligence Analysts – Per the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act* (Public Law 110-412), SHSP and UASI funds may be used to hire new staff and/or contractor positions to serve as intelligence analysts to enable information/intelligence sharing capabilities, as well as support existing intelligence analysts previously covered by SHSP or UASI funding. In order to be hired as an intelligence analyst, staff and/or contractor personnel must meet at least one of the following criteria:

- Successfully complete training to ensure baseline proficiency in *intelligence analysis and production* within six months of being hired; and/or,

- Previously served as an intelligence analyst for a minimum of two years either in a Federal intelligence agency, the military, or State and/or local law enforcement intelligence unit.

All intelligence analyst training should be in accordance with the Global Justice Information Sharing Initiative's (Global) *Minimum Criminal Intelligence Training Standards for Law Enforcement and Other Criminal Justice Agencies in the United States*, which outlines the minimum categories of training needed for intelligence analysts. These include subject-matter expertise, analytic methodologies, customer-service ethics, information handling and processing skills, critical thinking skills, computer literacy, and objectivity and intellectual honesty.

Overtime Costs – Overtime costs are allowable for personnel to participate in information, investigative, and intelligence sharing activities specifically related to homeland security and specifically requested by a Federal agency. Allowable costs are limited to overtime associated with Federally requested participation in eligible fusion activities including anti-terrorism task forces, Joint Terrorism Task Forces (JTTFs), Area Maritime Security Committees, DHS Border Enforcement Security Task Forces, and Integrated Border Enforcement Teams. Grant funding can only be used in proportion to the Federal man-hour estimate, and only after funding for these activities from other Federal sources (i.e. FBI JTTF payments to State and local agencies) has been exhausted. Under no circumstances should DHS grant funding be used to pay for costs already supported by funding from another Federal source.

Note: Both organizational costs (e.g., intelligence analysts, operational overtime), along with planning, equipment, training, and exercise personnel costs are applied towards the 15 percent personnel cap.

Operational Overtime Security Costs – In support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism, operational overtime costs are allowable for increased security measures at critical infrastructure sites across the Bay Area. FY 2011 UASI funds for organizational costs may be used to support select operational expenses associated with increased security measures at critical infrastructure sites in the following authorized categories:

- Backfill and overtime expenses (as defined in this Guidance) for staffing State or Major Urban Area fusion centers
- Hiring of contracted security for critical infrastructure sites
- Public safety overtime (as defined in this Guidance)
- Increased border security activities in coordination with Customs and Border Protection (CBP), as outlined in DHS Information Bulletin #135

FY 2011 UASI funds may only be spent for operational overtime security costs upon **prior approval** provided in writing by the FEMA Administrator. Therefore, Planning Hubs must notify the UASI Management Team in writing of their intent to use UASI funds for operational overtime security costs prior to any expenditure of funds for that purpose. The UASI Management Team will then seek permission from FEMA through the State of California Emergency Management Agency (CalEMA) and then notify the requesting Planning Hub(s) of FEMA's decision.

Equipment Activities

The 21 allowable prevention, protection, response, and recovery equipment categories and equipment standards for FY 2011 are listed on the web-based version of the Authorized Equipment List (AEL) on the

Responder Knowledge Base (RKB), at <https://www.rkb.us>. Unless otherwise stated, equipment must meet all mandatory regulatory and/or DHS-adopted standards to be eligible for purchase using these funds.

In addition, Planning Hub agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment. Planning Hubs that are using FY 2011 UASI funds to purchase interoperable communications equipment must do so in coordination with the Bay Area's Regional Interoperable Communications Strategy as well as the SAFECOM's coordinated grant guidance, which outlines standards and equipment information to enhance interoperable communications. The SAFECOM guidance can be found at <http://www.safecomprogram.gov>.

Training Activities

Allowable training-related costs under UASI include the establishment, support, conduct, and attendance of training specifically identified under the UASI grant program and/or in conjunction with emergency preparedness training by other Federal agencies (e.g., HHS, DOT). Allowable training activities include, but are not limited to:

- Overtime and backfill for public safety, emergency preparedness and response personnel attending FEMA-sponsored and approved training classes
- Overtime and backfill for public safety, emergency preparedness and response personnel attending FEMA-sponsored and approved training classes
- Overtime and backfill expenses for part-time and volunteer public safety and emergency response personnel participating in FEMA training
- Training workshops and conferences
- Full-time or part-time staff or contractors/consultants
- Travel
- Supplies
- Tuition for higher education

Training conducted using UASI funds should seek to address a gap identified in the Strategy, or through the Bay area's several specific training plans, an After Action Report/Improvement Plan (AAR/IP) or contribute to building a capability that will be evaluated through an exercise.

Exercise Activities

Exercises should be used to provide the opportunity to demonstrate and validate skills learned in training, as well as to identify training gaps. Any training or training gaps should be identified in the Strategy, AAR/IP and/or addressed in the Bay Area training plans and cycle. Exercises must be managed and executed in accordance with the Bay Area's Homeland Security Exercise and Evaluation Program (HSEEP). HSEEP Guidance for exercise design, development, conduct, evaluation, and improvement planning is located at <https://hseep.dhs.gov>. The HSEEP Library provides sample exercise materials and templates. Allowable exercise activities include, but are not limited to:

- Design, develop, conduct, and evaluate an exercise
- Exercise planning workshop
- Full-time or part-time staff or contractors/consultants

- Overtime and backfill costs, including expenses for part-time and volunteer emergency response personnel participating in FEMA exercises
- Implementation of HSEEP
- Travel
- Supplies

All exercises using UASI funding must be NIMS/SEMS compliant. More information is available online at the NIMS Integration Center, <http://www.fema.gov/emergency/nims/index.shtm>.

Law Enforcement Terrorism Prevention-Oriented Allowable Costs (SHSP, UASI)

For FY 2011, all Planning Hubs must obligate at least 15% of their total award toward law enforcement terrorism prevention activities (LETPA). LETPA activities funded with any portion of the \$1 million allocated to any of the three major cites will go towards meeting the 15% requirement for the Planning Hub in which the major city is a part. Law enforcement terrorism prevention and protection-oriented activities include, but are not limited to, the following:

LETPA Planning Activities:

- Establishment / Enhancement of Fusion Centers
- Hiring an IT specialist to plan, develop, and implement the IT applications necessary for the fusion center
- Developing and planning for information/intelligence sharing groups
- Hiring contractors and consultants to make recommendations on the development of capabilities at State and Major Urban Area fusion centers; such centers should be designed in support of the analytic and other baseline capabilities as outlined in the Global Justice Information Sharing Initiative's (Global) *Baseline Capabilities for State and Major Urban Area Fusion Centers*
- Developing mass evacuation plans
- Conducting point vulnerability analyses and assessments
- Soft target security planning (e.g., public gatherings)
- Developing border security operations plans in coordination with CBP
- Developing, implementing, and reviewing Area Maritime Security Plans for ports, waterways, and coastal areas
- Updating and refining threat matrices
- Integrating and coordinating private sector participation with fusion center activities
- Developing and implementing civil rights, civil liberties and privacy policies, procedures, and protocols
- Acquiring systems allowing connectivity to State, local, tribal, territorial, and Federal data networks, such as the National Crime Information Center (NCIC) and Integrated Automated Fingerprint Identification System (IAFIS), as appropriate
- Designing and developing State and local geospatial data systems
- Costs associated with the adoption, implementation, and adherence to NIMS compliance requirements; including implementing the NIMS National
- Credentialing Framework
- Integrating and coordinating private sector participation with fusion center activities

LETPA Organization Activities:

- Reimbursement for select operational expenses associated with increased security measures at critical infrastructure sites incurred **(subject to the 15% cap and other rules in this guidance)**.
- Overtime for information, investigative, and intelligence sharing activities **(subject to the 15% cap and other rules in this guidance)**.
- Hiring of new staff positions/contractors/consultants for participation in information/intelligence analysis and sharing groups or fusion center activities **(subject to the 15% cap and other rules in this guidance)**.

LETPA Authorized Equipment List Categories

- Personal Protective Equipment
- Explosive Device Mitigation and Remediation Equipment
- CBRNE Operational Search and Rescue Equipment
- Information Technology
- Cyber Security Enhancement Equipment
- Interoperable Communications Equipment
- Detection
- Power
- CBRNE Reference Materials
- CBRNE Incident Response Vehicles
- Terrorism Incident Prevention Equipment
- Physical Security Enhancement Equipment
- Inspection and Screening Systems
- CBRNE Prevention and Response Watercraft
- CBRNE Aviation Equipment
- CBRNE Logistical Support Equipment
- Intervention Equipment
- Other Authorized Equipment

LETPA Training Activities

Law enforcement terrorism prevention, protection-oriented funds may be used for a range of law enforcement terrorism prevention related training activities to enhance the capabilities of State and local personnel. Grant funds may be used to support intelligence analyst training in the following manners:

- Participation in DHS approved intelligence analyst training: Those wishing to develop or sponsor intelligence analyst courses for a national audience should submit courses to CalEMA for review and approval. The list of approved courses will be constantly updated and can be accessed in the FEMA catalog at:
http://www.firstrespondertraining.gov/odp_webforms.
- Limited participation in non-FEMA approved intelligence analyst training: States and UASIs may send students to attend non-approved intelligence analysis courses for up to three offerings in accordance with the training process. A certificate of completion of all intelligence analyst

training must be on file with CalEMA and must be made available to FEMA Program Analysts upon request upon the hiring of personnel.

Other allowable costs include training courses that focus on:

- Building information sharing capacities (especially among law enforcement, non law enforcement, other government agencies, and the private sector)
- Methods of target hardening
- Facility law enforcement security personnel, to include facilities, vessels, and ports
- CBRNE, agriculture, and cyber threats
- History of terrorism and social environments contributing to threats
- Surveillance and counter-surveillance techniques
- Privacy, civil rights, and civil liberties regulations, policies, procedures, and protocols
- Critical Infrastructure Protection training, to include identifying/assessing critical infrastructure assets, vulnerabilities, and threats
- Cyber/agriculture/food security threats recognition and protective measures training
- Cultural awareness training for community engagement activities and undercover operations related to terrorist organizations
- Languages such as Arabic, Urdu, or Farsi which are spoken by known terrorists and terrorist organizations
- Joint training with other homeland security entities (e.g., U.S. Secret Service, CBP)
- Using interoperable communications equipment
- Collection, analysis, mapping, integration, and dissemination of geospatial data and imagery
- Geospatial database use, design, development, and management training
- Volunteer participation to support law enforcement and community policing activities related to increased citizen awareness of terrorism activities, to include the Volunteers in Police Service and Neighborhood Watch programs

LETPA Exercise Activities

Law enforcement terrorism prevention protection-oriented funds may be used to design, develop, conduct, and evaluate terrorism prevention-related exercises, including the following:

- Exercises to evaluate the effectiveness of information sharing plans, policies, procedures, and protocols
- Exercises to evaluate NIMS implementation. This includes costs associated with exercising components of the NIMS National Credentialing Framework
- Exercises to evaluate facility and/or vessel security protection
- Exercises to evaluate area maritime security protection
- Exercises to evaluate threat recognition capabilities
- Exercises to evaluate cyber security capabilities
- Exercises to evaluate agricultural/food security capabilities
- Exercises to evaluate prevention readiness and techniques
- “Red Team” (force on force) exercises
- Interoperable communications exercises
- Critical infrastructure vulnerability, protection, and/or attack exercises

- Where practical, these exercises should involve the public sector, non- governmental partners, trained citizen volunteers, and the general public. State and local governments should work with their Citizen Corps Councils to include volunteers from programs

Construction and Renovation

Use of UASI funds for construction is generally prohibited except as outlined below. Such construction shall be strictly limited and allowable only when it is a necessary component of a security system at critical infrastructure facilities. Project construction not exceeding \$1,000,000 is allowable as deemed necessary.

The following types of projects are considered to constitute construction or renovation and must be submitted to the Bay Area UASI Management Team for submission to CalEMA and then to FEMA for compliance review under Federal Environmental planning and Historic Preservation (EHP) laws and requirements prior to initiation of the project:

- Construction and renovation of guard facilities which are intended to provide enhanced security at grantee-designated critical infrastructure sites.
- Renovation of and modifications, including the installation of security and communication equipment, to buildings and structures that are 50 years old or older. Any other construction or renovation efforts that change or expand the footprint of a facility or structure, including security enhancements to improve perimeter security
- Physical security enhancements including, but not limited to:
 - ✓ Lighting
 - ✓ Fencing
 - ✓ Closed-circuit television (CCTV) systems
 - ✓ Motion detection systems
 - ✓ Barriers, doors, gates, and related security enhancements

In addition, the erection of communications towers that are included in a jurisdiction’s interoperable communications plan is allowed, subject to all applicable laws, regulations, and licensing provisions. Communication tower projects must be submitted to the Bay Area UASI Management Team for submission to CalEMA and then to FEMA for EHP review. Per the Department of Homeland Security Appropriations Act, 2010 (Public Law 111-83), communications towers are **not** subject to the \$1,000,000 construction cap. However, this rule may change upon passage of the 2011 appropriations budget.

In order to draw down funds for construction and renovation costs under the UASI grant, Planning Hubs must provide to the Bay Area Management Team:

- A description of the asset or facility, asset location, whether the infrastructure is publicly or privately owned, and the construction or renovation project
- Certification that a facility vulnerability assessment has been conducted
- An outline addressing how the construction or renovation project will address the identified vulnerabilities from the assessment
- Consequences of not implementing the construction or renovation project

- Any additional information requested by FEMA to ensure compliance with Federal EHP requirements

Other Allowable Costs – Maintenance and Sustainment

The use of UASI grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable under all active and future grant awards, unless otherwise noted. Planning Hubs are reminded to be sensitive to supplanting issues. Maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees previously purchased with State and/or local funds **cannot** be replaced with Federal grant funding. Routine upkeep (e.g., gasoline, tire replacement, routine oil changes, monthly inspections, grounds, and facility maintenance, etc.) is the responsibility of the grantee and may not be funded with preparedness grant funding.

Other Allowable Costs - Secure Identification (SHSP Only)

In addition to the expenditures outlined above, SHSP funds may be used to support the implementation activities associated with the Western Hemisphere Travel Initiative (WHTI), including the issuance of WHTI-compliant tribal identification cards. More information on the WHTI may be found at:

http://www.dhs.gov/files/programs/gc_1200693579776.shtm or
http://www.getyouhome.gov/html/eng_map.html.

Technology Requirements

National Information Exchange Model (NIEM). FEMA requires all grantees to use the latest NIEM specifications and guidelines regarding the use of Extensible Markup Language (XML) for all grant awards. Further information about the required use of NIEM specifications and guidelines is available at <http://www.niem.gov>.

B. Bay Area UASI Travel Policy



BAY AREA UASI TRAVEL POLICY

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BAY AREA UASI TRAVEL POLICY

SCOPE OF THIS MANUAL

Policies, Guidelines And Procedures

This manual is intended to provide policies and guidelines for the BAY AREA UASI (BAUASI). This manual is intended to establish procedures for the Management Team, Approval Authority Members, Advisory Group Members, Affiliated Non-Employees, and others who incur authorized business travel expenses on behalf of the BAUASI.

Affected Parties

The policies, guidelines and procedures contained herein apply to the Approval Authority Members, Management Team, Advisory Group Members, Contractors, Affiliated Non-Employees, and other similar individuals.

For the remainder of this document, BAUASI business travelers will be referred to as “travelers” or “employees,” unless otherwise noted.

PURPOSE, OBJECTIVES AND PRINCIPLES

Purpose

This guideline is to provide BAUASI travel rules and provide guidance to what expenses will be allowed.

As a general rule:

Travelers or employees should incur only those expenses that a reasonable and prudent person would incur when traveling on official business.

Due consideration should be given to such factors as suitability, convenience, and the nature of the business involved. Travel expenses are reimbursable for travelers and employees who travel on official business on behalf of the BAUASI, subject to the allowances, limits, and requirements discussed below.

Objectives

The objectives of the BAUASI’s travel policy and procedures documents are as follows:

- To support travel costs incurred on behalf of the BAUASI for the purpose of conducting official business;
- To establish uniform criteria and approval for advances and reimbursement of travel expenses for BAUASI business travelers;
- To ensure all BAUASI business travelers have a clear and consistent understanding of policies and procedures for business travel;
- To avoid the improper use of funds for travel that does not benefit the BAUASI.

Guiding Principles

Travel on behalf of the BAUASI will be approved if it constitutes official business on behalf of the BAUASI and the purpose results in a benefit to the BAUASI.

Definition of Official Business

To constitute “official business on behalf of the BAUASI”, the activities of an employee or traveler of the BAUASI must clearly demonstrate that there is a valid BAUASI interest to be served or gained through the travel; and there is:

- a. Relevance to the BAUASI’s operations or the individual’s role in such operations; and/or
- b. The promotion or development of the BAUASI’s programs, methods or administration; and/or
- c. Compliance with instructions or authorization for BAUASI.

Prudent Person Standard

All expenses incurred while traveling on BAUASI business should be a reasonable and prudent use of public funds. Cost will be taken into account when weighing the importance and benefits of the business purpose for travel. Travelers should choose the most efficient, direct and economical travel options required for the occasion and any individual who chooses a different route, without adequate justification, must assume any additional expense incurred. If for traveler’s personal convenience, there is interruption or deviation from the direct route, the travel cost cannot exceed that which would have been incurred on uninterrupted travel.

Travel is authorized for the minimum number of persons necessary to carry out the business purpose of the travel, and only for those whose job tasks are directly related to the purpose of the travel. For travel within the state, no more than two (2) Management Team employees should be allowed to attend the same seminar or workshop, unless individual attendance is required for educational or certification purposes. For out-of-state, international travel, and travel to non-continental destinations, no more than two (2) Management Team employees and no more than ten (10) travelers (for a total of twelve(12)) may travel to the same destination for the same purpose, without prior approval by both the Approval Authority and/or the General Manager. (See Travel Authorization Below)

It is the objective to diversify the number of persons requesting to travel, giving more weight to those who haven’t traveled previously to attend a seminar, conference, or workshop to those who previously traveled to attend such events. It is also the intention to diversify participation among the Bay Area Region to allow regional stakeholders, advisory group members, working group members, affiliated non-employees, and other similar individuals the opportunity to attend a seminar, conference, or workshop. Lastly, attending employees or travelers shall be required to give a presentation or report to other fellow employees or group members after returning from a workshop, seminar, or similar event.

If there are specific reasons for which the General Manager approves attendance of more than two employees of the Management Team for a seminar, workshop, or similar event which is not for education certification purposes, the additional costs and the justification notes will be reviewed and reported to the Chair of the Approval Authority whose concurrence would be needed.

Occasions for Travel

Examples include the following types of occasions when the BAUASI traveler is required to travel out of the general region to:

- Attend a convention, seminar, meeting, school, or training;

- Make professional presentations as a representative for the BAUASI;
- Interview persons; inspect programs, facilities or institutions; conduct surveys; exchange professional information;
- Work at a project location sufficiently distant from the main or regular place of work to require overnight lodging
- Work long hours away from the main or regular place of work where daily travel is impractical;
- Participate in formal activities, including hosting of persons who, for protocol reasons, merit appropriate courtesies and hospitality;

Non-occasions for Travel

Membership in an organization is not of itself a basis for travel authorization, and in no circumstance shall employees be authorized to travel as a reward for meritorious service, performance, or employee recognition, unless the purpose is to receive an award of formal recognition bestowed by a recognized outside organization for work performed for the BAUASI.

Exception Principles

Exceptions to specific provisions of the BAUASI travel policy may be authorized by the General Manager on a case-by-case basis, and only when there is adequate written justification and documentation and the travel is within the intent of the overall travel policy. Allowable exceptions are confined to the following conditions:

- To serve the business interest of the BAUASI;
- To avoid a severe hardship or inconvenience;
- To observe an established or expected protocol at a specified event;
- To respond to an emergency situation

Possible Conflict with Labor Agreements or Laws

These policies apply to all of the BAUASI's employees unless they are in conflict with specific provisions of existing labor agreements or with specific provisions of state or federal law. In such cases, the provisions of those agreements or laws shall prevail for the employees covered under those agreements or laws.

Geographical Categories

BAUASI travel policies cover three geographical categories:

- In-State
- Out-of-State (within contiguous 48 states)
- International and Travel to Non-Continental US territory

Advance Fund Request and Claims Submission

BAUASI travelers may submit a request for advance funds to cover anticipated out-of-pocket travel expenses whenever the expenses are incurred as part of official duties. He or she may also submit a claim for reasonable, actual and necessary incurred expenses related to such authorized travel.

Prudent Judgment and Common Sense

While this manual tries to provide specific guidelines for most circumstances that might be encountered while traveling on BAUASI business, it cannot anticipate all possible circumstances. When such circumstances occur, employees should use prudent fiscal judgment and common sense in the expenditure of public funds.

RESPONSIBILITY AND ENFORCEMENT

Traveler

Anyone who travels on BAUASI business, or supervises someone who travels, is responsible for knowing the general intent of the travel policy. The traveler is responsible for complying with the BUASI's travel policies and exercising reasonable and prudent judgment related to BAUASI business travel. The traveler is also responsible for obtaining proper authorization and preparing and submitting expense reports on a timely basis along with appropriate receipts.

Approval Authority Members and Management Team

Approval Authority Members and the Management Team are responsible for travel requests and expenditures, and for exercising due diligence to ensure that authorized travel is necessary and appropriate for the conduct of BUASI business, that the cost is reasonable and justified by the trip's purpose, and that the travel expenditures are budgeted and within budgetary limits. They are also responsible for assuring that expense reports are accurately reviewed for compliance and for review and recommendation regarding exceptions.

The policies, guidelines and procedures mentioned below do not preclude more restrictive internal approval procedures which the BAUASI may choose to implement internally to better monitor and control the budget. While this policy places the primary responsibility for travel oversight on the Chief Financial Officer of the Grants Management Unit, the General Manager and Chair of the Approval Authority may impose additional approval levels or processes.

General Manager

The General Manager establishes common and consistent travel practices as govern by these policies and guidelines. The General Manager Officer has lead responsibility in the regular review of travel policies and procedures and the development of amendments, as needed. The General Manager, along with the Approval Authority , reviews and approves international travel requests. The General Manager has the authority to grant an exception to a specific provision of the travel policy. The General Manager has final approval authority as to the appropriateness and reasonableness of reimbursement requests, other than exceptions described above.

Chief Financial Officer

The Chief Financial Officer works with the General Manager to maintain common and consistent travel practices as governed by these policies and guidelines.

Grants Management Unit

The Grants Management Unit is responsible for exercising general oversight for the processing of reimbursement requests in order to ensure consistency with the policies and guidelines set forth in this document. The Grants Management Unit processes claims, including conducting

desk audits, and provides timely, accurate reimbursement to claimants. Regular updates to the published travel policies and procedures are provided by the Grants Management Unit.

TRAVEL AUTHORIZATION

Obtaining Travel Authorization

Travel authorization should be obtained as early as reasonably possible, prior to the date of travel. Authorization is required for all BAUASI travel for official business purposes. Employees or travelers must always secure advance approval from their direct supervisor/manager for all BAUASI travel. This approval must always be in writing as stated in the section which follows (Advance Written Request).

Written request for travel is made on the Travel Authorization form. Blank forms and completed samples can be found in Appendix A.

Advance Written Request

In-State and Out-of –State Travel

Advance written request and approval by the General Manager is required if travel includes overnight stay, airfare, or advanced funds or transportation involving a rented. For Approval Authority Members and employees from other jurisdictions, except those working for the Fiscal Agent, advance written request must first be approved at the appropriate department of the home jurisdiction and; then subsequently forwarded to the General Manager for pre-approval. For in-state and out-of-state travel, no more than two (2) Management Team employees should be allowed to attend the same seminar or workshop, unless individual attendance is required for educational or certification purposes.

Travel On Behalf of a National Association, Board, and/or Committee

Advance written request and approval by the Approval Authority is required if travel is based upon holding office on a national association, board, and/or committee.

International Travel and Travel to Non-Continental Destinations

Advance written request and approval by both the Approval Authority and General Manager is required if travel includes overnight stay, airfare, or advanced funds or transportation involving travel to non-continental destinations. For Approval Authority Members and employees from jurisdictions other than the Fiscal Agent, an advance written request must first be approved at the appropriate department of the home jurisdiction, and then subsequently forwarded to the Approval Authority and General Manager for pre-approval. For international travel and travel to non-continental destinations, no more than two (2) Management Team employees and no more than ten (10) travelers (for a total of twelve (12)) may travel to the same destination for the same purpose, without prior approval by the Approval Authority and the General Manager.

In addition to the above, Approval of international travel should be obtained using the following procedures:

1. A request for international travel must be submitted, on agency letterhead, to the UASI 6 months before the scheduled travel dates. The request should include:
 - a. The dates and locations and proposed itinerary for the international travel;

- b. The purpose of the international travel, including a description of the event, training, or exercise to be attended.
 - c. The number, names, titles, and roles of each individual scheduled for this international travel event.
 - d. The estimated expense budget for the international travel, including estimated air fare, lodging, per diem, and any other associated expense.
 - e. The expected benefit to the sub-recipient and to the UASI grant, if the international travel is approved.
2. If the overseas travel involves a training activity, the requesting agency must submit, on agency letterhead, a separate written request that describes:
 - a. Name/address/contact information of the training provider.
 - b. Proposed Agenda of day to day activities.
 - c. The estimated expense budget for the international training activity, including registration/tuition, estimated air fare, ground transportation, lodging, meal per diem, and any other associated expense.
3. Travel and budgetary approvals from CalEMA and DHS can take up to 5 months. Subrecipients should provide updated budget and itinerary information, as needed by CalEMA or DHS, and before final travel arrangements are made.
4. Authorized international travel must follow the sub-recipient's local travel policy. However, in the absence of any international travel policy, the sub-recipient must adhere to the Federal Travel Regulations (41 CFR, Chapters 300-304).
5. Upon receipt of all approvals, the sub-recipient shall ensure that all necessary grant modifications are requested from the UASI, and training feedback numbers are obtained for the international travel event.
6. Upon completion of the international travel, and before expenses are invoiced and reimbursed, sub-recipient shall submit a travel report that assesses the relative success or failure of the trip, knowledge or training gained from the trip, and quantifies any benefits to the UASI grant.

Travel Authorization Form

As stated above, all requests for business travel require approval in advance by the Chief Financial Officer. A travel authorization form must be completed and signed by the employee or traveler. (See blank form attached as appendix A). The travel authorization form shall include:

- Date(s) of travel and location;
- Business purpose of travel (training/conference/meeting);
- Estimated expenses including registration fee, cost of air ticket, other transportation costs (i.e. taxi, shuttle, or car rental), and lodging. Fully itemized detail in accordance with the guidelines in this document must be provided for estimated expenses.

Travel Expenses

Travel expenses include lodging, transportation costs, registration or attendance fees, meals and other costs reasonably and necessarily incurred that are paid for by the BUASI, or by the traveler or employee subject to reimbursement by the BAUSI, when a traveler or an employee is required to

travel on official business. The Chief Financial Officer should only allow travel that is clearly anticipated in the BAUASI approved budget. ***Employees and travelers are responsible for cancellation of lodging and transportation if travel is cancelled or postponed, to ensure that the BAUASI will not be liable for any costs.***

Issuing and Monitoring Travel Advances

When a travel advance (TA) is needed for authorized business travel, the TA requires approval by the Chief Financial Officer. The approved request along with documentation for expenditure estimates supporting the advance amount should be forwarded to the Grants Management Unit for processing. When travel advances are issued, the minimum advance amount is \$1,000.

TAs can be issued for lodging, conference registration fees, and transportation expenses. TAs are not allowed for airfare as employees can purchase air tickets through an approved vendor of the fiscal agent. Checks are issued to employees approximately ten business days prior to travel. The Grants Management Unit should process the TA travel advance document in the fiscal agent's financial (FAMIS) allowing sufficient time for check issuance. TAs must be cleared in FAMIS within ten business days of return from a travel. The Grants management Unit is responsible for monitoring advances and following up with employees to ensure advances are cleared timely.

If a TA is not liquidated timely, the employee will have a payroll offset and will not be eligible for TAs for a minimum of two years from the date of the offset. Employees with an outstanding advance cannot receive another travel advance. If more than one payroll offset in a six month period, the TAs may be frozen.

TRAVEL CLAIMS

General Guidelines

When filing a travel Claim, the employee or traveler is required to submit all supporting documentation including, but not limited to, approved Travel Expense Voucher, air or other itinerary, conference/meeting/workshop schedule and agenda, original itemized receipts, proof of payment, any necessary pre-approvals and/or justifications, etc.

Submitting and Processing of Travel Expense Vouchers

Complete expense reimbursement requests or travel liquidations must be fully supported by original receipts and forwarded to the Grants Management Unit no more than 30 days from return of travel. If a travel advance was issued, the advance must be liquidated and any unused funds returned to the BAUASI within 10 days of return. Reimbursement requests with incomplete documentation will be denied. Expense reimbursement must be processed in the BAUSAI's financial system (FAMIS Accounting) no more than 90 days upon return of the trip. Employees or travelers are responsible for forwarding complete and timely travel claims to the Grants Management Unit no more than 30 days from return of travel, or 10 days if an advance was issued.

Employees or travelers are required to specify the business purpose of the trip, destination, conference/workshop/meeting dates, travel dates, and times (departure and return). The business purpose should be descriptive enough to clearly answer any questions regarding the necessity of the travel.

Reviewing Travel Claims

When reviewing travel claims, the Grants Management Unit is responsible for:

- Ensuring expenditures are reasonable, necessary, and for official business purpose and duration does not exceed official business trip requirements;
- Reviewing and auditing for compliance with the BUASI travel manual;
- Requesting additional documentation, information, justification from employee as needed;
- Deducting unallowable expenses;
- Reviewing to ensure the request is in compliance with project/grant requirements;
- Verifying authorized approver.
- Ensuring all appropriate/required and supporting documentation submitted and maintained in department files;
- Approving/denying travel claim in a timely manner;
- Processing reimbursements in a timely manner. Reimbursements must be completed in the BAUSI's financial system within 90 days from return of business travel.

Processing Travel Reimbursements

The Grants Management Unit will process travel reimbursements in fiscal agent's acting system (FAMIS). The Grants Management Unit must have at least one initiator and one approver in FAMIS Accounting.

TRANSPORTATION

General Guidelines

Travelers or Employees will be expected to obtain the lowest published routine fare for travel by the **most efficient, direct and economical mode of transportation** required by the occasion. Travelers or Employees may book their air or rail travel with travel agencies approved by the fiscal agent or on-line directly with the airline. Travelers or Employees will be charged in FAMIS for the airfare if booking is made with travel agencies of the fiscal agent. Alternatively, if employees make their own arrangements, they will have to pay first and request reimbursement.

If an alternative mode of transportation is selected, the allowable cost shall be the lower of the actual cost of alternative modes of transportation or the lowest economy/coach class airfare available for the date and time selected.

Use of Vehicles

Vehicle use for travelers on official business is reimbursable. In all instances, the most direct and cost efficient route must be taken. When multiple employees are attending the same business activity (i.e. out-of town meeting, conference, etc.), employees are strongly encouraged to carpool. Employees are personally responsible and will not be reimbursed for traffic violations or other penalties for infractions of any law.

The following information is required to be included on the employee Travel Expense Voucher:

- Business purpose for use of vehicle.
- Starting point (i.e. worksite or home, whichever is the closer of the two) and the destination.
- Vehicle make, model and license #. If using City issued vehicle, provide vehicle number.
- Odometer reading, beginning and ending.

Personal Vehicle

In accordance with the fiscal agent's local ordinance (i.e., Section 10.28-1 of the San Francisco Administrative Code), the mileage rate for payments to officers and employees for use of privately

owned automobiles in connection with any official duty or service shall be at the rate established by the Controller.

Effective July 1, 2011, the IRS standard mileage rate for business use of an automobile is 55.5 cents per mile.

Mileage is reimbursed when using personal vehicle, fuel is not reimbursed.

Personal expenses such as private vehicle repair and maintenance are not reimbursable.

When using personal vehicle for official business, all passengers in the vehicle must be on official business the BAUASI.

Vehicle of the Fiscal Agent

When using a vehicle of the fiscal agent, fuel should be obtained from Central Shops. When impractical to do so, fuel purchased at a commercial location is reimbursed with written justification and original receipt(s). Mileage is not reimbursed.

All passengers traveling in a vehicle of the fiscal agent must be on official business of the BAUASI.

Rental Car

- (a) The car rental amount and estimate of other related expenses such as parking and fuel, and
- (b) Justification why other forms of transportation are not appropriate, why a rental car is necessary, and how a rental car is the most economical and efficient/practical.

All passengers traveling in a rental vehicle must be on official business of the BAUASI.

Car rental is limited to standard compact size vehicle. Midsize vehicle is reimbursable if use is for three people or more, justification provided, and pre-approved in writing by the Chief Financial Officer.

Original receipts and car rental pre-approval are required to be submitted with reimbursement requests.

As the City is self insured, auto insurance is not reimbursable.

MODE OF TRAVEL

Air Travel

Airfare should be booked for economy/coach class only. Business or First class is not reimbursable. Upgrades are not reimbursable. Air ticket must be purchased in advance to take advantage of the most economical fares available. Same day or near travel day ticket purchases are not reimbursable unless approved by the General Manager and properly justified.

Air travel itinerary is required to be submitted with travel claim documentation. If airline charges for checked luggage, reimburse the cost of first checked bag only. Additional baggage check-in costs will be reimbursed with justification explaining the business need for extra luggage.

Mileage for long distances, employee drives instead of flying

In situations where employees or Travelers would normally travel by air, but an employee or traveler chooses to drive instead, reimbursement will be the lower of the two options, driving or flying. At the time of the travel authorization, employee must obtain a quote from an approved vendor of the Fiscal Agent documenting the cost of air ticket for the travel dates. Maximum reimbursement will be up to the quoted cost of the air ticket.

Example: Training in Los Angeles, CA, employee drives instead of flying. In all cases, reimbursement will be the lower of the two options.

Mode of Transportation

- (a) Employee drives personal car
- (b) Employee drives fiscal agent's vehicle

- (c) Employee drives rental car

Expenses Reimbursed

- (a) Mileage, up to the cost of air ticket quote.
- (b) Fuel expenses, up to cost of air ticket quote, when impractical to obtain fuel from Central Shops.
- (c) Cost of car rental and gas expenses, up to the cost of air ticket quote.

Transportation between worksite/home and airport within SF Bay Area

- Recommended options are public transportation or shuttle.
- If using taxi, maximum reimbursement is \$50 each way, including tip, up to \$100 total for the related travel.
- If using personal car,
 - (a) Mileage is reimbursed up to \$15 each way, maximum \$30 total for the related travel.
 - (b) Parking is limited to long-term parking only, maximum of \$15 per day, up to \$100 total for the travel.
 - (c) When using personal vehicle, employee will not be reimbursed for any damages that may occur.

Transportation during the travel between airport and hotel / conference site

- Recommended options are public transportation, shuttle, or taxi.
- Car rental is reimbursable if the requirements stated in the Use of Vehicles section are met.
- For overnight travel in which employee or traveler uses personal, City, or rental vehicle, maximum reimbursement for overnight hotel parking is limited to \$20 per day.

LODGING

The most economical and practical accommodations available considering the purpose of the meeting, and other relevant factors will be reimbursed. For travel within the United States, the maximum reimbursement is the lesser of either the Federal per-diem GSA (General Services Administration) rate for lodging or the rate used by the home jurisdiction of the employee or traveler. To stay within the maximum rates, conference discount rates and "government rates" should be used whenever possible.

If the home jurisdiction rate exceeds the Federal per-diem GSA rate, the employee or traveler will be reimbursed only up to the GSA rate. Any amount exceeding the GSA rate will be the responsibility of the home jurisdiction of the employee or traveler. Similarly, if the GSA rate exceeds the rate of the home jurisdiction, the employee or traveler will be reimbursed only up to the rate of the home jurisdiction.

. In rare circumstances, with appropriate pre-approval and justification of business need, employees may be reimbursed beyond the federal per diem rate. An itemized hotel bill is always required for reimbursement to be made. Reimbursement should be for single room rate.

Conference Hotel

- If conference hotel lodging rates exceed the Federal rate, reimbursement of actual expenses will be the responsibility of the home jurisdiction of the employee or traveler.
- Hotels recommended by the conference or overflow hotels with a conference rate will be reimbursed when documentation of the conference lodging rate and a receipt are provided.

- If a hotel is listed as recommended/overflow hotel but does not have a documented conference rate, reimbursement will be for actual expenses, with maximum up to the conference hotel rate only.
- Required documentation of the conference lodging rate includes copy of conference registration information showing location, dates of conference, conference hotel(s), and single room rate. Documentation of the conference hotel rate must be provided.
- For hotels not listed in the conference material, maximum reimbursement is GSA rate.

Lodging in Excess of Federal Per Diem Rate

- In situations where employee is unable to find lodging at GSA rate or business circumstances require employee to stay in a hotel that exceeds the federal per diem rate, reimbursement will be allowed if all of the following requirements are met.
- - (a) Written pre-approval by the General Manager.
 - (b) Justification of business need and demonstration of most economical and practical, i.e. the only lodging within federal per diem rate is located a long distance from the meeting site and would require a car rental or costly taxi ride, which in total exceeds the cost of the higher lodging rate.
 - (c) Itemized hotel bill must show employee obtained “Government rate” and rate is reasonable, not to exceed one and half times the federal per diem rate.

If these requirements are not met, the reimbursement will be reduced to the federal per diem rate.

City Not on the CONUS Per Diem Listing

- If a city is not listed, check to ensure that the county within which it is located is also not listed. On the GSA website there is a link to the National Association of Counties which can help determine the county a destination is located in.
- If the city is not listed, but the county is, then the per diem rate is the rate for that entire county.
- If the city and the county are not listed, then that area is considered to be a Standard CONUS location which is currently \$70 for lodging and \$46 for meals and incidental expenses.

Lodging for Travel Within Local Commuting Area

- Lodging for travel within the local commuting area requires written pre-approval by the Chief Financial Officer. The Grant Management Unit is required to maintain documentation of the pre-approval and the justification of business need with the employee travel claim document.
- For the fiscal agent, local commuting area is defined as within the nine Bay Area counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma.

Federal domestic and foreign lodging, maximum travel per diem allowances, meals and incidental expense breakdown are available from the following website:

Double click here for access to **U.S. General Services Administration** at **<http://www.gsa.gov>**

Meals and Adoption of the Federal Meal and Incidental Expenses (M&IE) Rate

Meals and incidentals are reimbursed according to the guidelines below if **the travel is overnight and is pre-approved as an exception by the Chief Financial Officer**. The Federal rate for meal and incidental expenses (M&IE) will be paid without itemization of expenses or receipts. If an officer or employee chooses to request specific reimbursement for meals, original itemized receipts are required. For employee travel, the maximum meal reimbursement is up to the federal per diem rate.

Each city in the Federal rate guide has a dollar value for the full day depending on the relative cost of meals in that jurisdiction. Once you obtain the total dollar value, you can refer to this table to determine the rates for each meal:

Federal Domestic Meal & Incidental Expense (M&IE) Rates

M&IE RATE	\$ 46	\$ 51	\$ 56	\$ 61	\$ 66	\$ 71
(FULL DAY)						
Continental	\$ 7	\$ 8	\$ 9	\$ 10	\$ 11	\$ 12
Breakfast/Breakfast						
Lunch	\$ 11	\$ 12	\$ 13	\$ 15	\$ 16	\$ 18
Dinner	\$ 23	\$ 26	\$ 29	\$ 31	\$ 34	\$ 36
Incidentals	\$ 5	\$ 5	\$ 5	\$ 5	\$ 5	\$ 5

Conference Provided Meals

- If one or more meals are included as part of a conference registration fee, you should only charge the remaining meals and incidental expense rate from the above chart. A copy of the conference schedule and any other conference information must be attached to the travel claim documentation.
- You cannot claim per diem in lieu of conference provided meals. There are no exceptions allowed.

Meal and Incidental Per Diem on Travel Days

- When a per diem reimbursement is requested for part of a day, please use the rates in the M&IE chart to determine meal reimbursements. Partial per diem is based on travel times. Departure and arrival times must be documented on the travel reimbursement form approved by the Chief Financial Officer.
- Breakfast per diem if leave home before 6am.
- Lunch per diem if leave worksite/home before 10am (day of departure) or return to worksite/home after 2pm (day of return).
- Dinner per diem if return to worksite/arrive home after 7pm.
- Full day incidental is allowed on travel days.

Incidental Expenses

- Includes transportation between places of lodging or business and places where meals are taken, if suitable meals cannot be obtained within walking distance of the conference/training site or hotel.
- Fees and tips given to porters, baggage carriers, bellhops, hotel maids and stewards.
- Mailing costs associated with filing travel vouchers.

Travel In the Local Commuting Area

- Does not qualify for the per diem reimbursement, e.g. attending conferences, meetings, trainings, etc. The only exception for allowing meal per diem is when employee was pre-approved by the Chief Financial Officer for overnight travel/lodging within nine Bay Area counties.

Day Trips/Same Day Travel (e.g. for Conference, Training, Meeting, etc.)

- No meal per diem

Other Expenses

Other expenses associated with and incurred in the performance of the BAUASI business while in travel status, deemed necessary and reasonable by the Chief Financial Officer, are reimbursable. These include ground transportation (to or between the officer or employee’s work site and airport, bus station, train depot and the meeting or lodging site and return), parking fees, bridge tolls, necessary business telephone charges, copying charges, and business-related internet access. These expenses are to be reviewed by the Chief Financial Officer and only approved if deemed reasonable and proper.

Travel Change or Cancellation Fee

- Travel agencies or airlines charge up to \$150 for itinerary changes and cancellation fee when an employee changes or cancels a flight reservation. If this situation arises, the employee must submit written justification explaining the reason/business need for the itinerary change or cancellation, including approval from the Department’s Authorized Travel Signatory in order for change/cancellation fee to be reimbursed.
- For a cancelled air ticket, the amount paid is credited to the employee’s name.
 - (a) If air ticket was booked through a City travel agency, the Grant Management Unit is responsible for monitoring use of the credit and ensuring use for authorized official business travel only.

(Travel Change or Cancellation Fee cont)

(b) If booked on-line directly by employee, the City will reimburse for the cancellation fee if justified business reason for cancellation is provided and approved by the Chief Financial Officer. The City will not reimburse for the cancelled air ticket.

Business Calls, Fax and Internet Usage

- Employees or travelers will be reimbursed for reasonable usage with original receipt.
- Business purpose and justification of need required to be documented.
- Identify all business internet charges, business calls, faxes, etc. on the hotel bill.

Original receipts are required for all other travel and official expenses related to official BAUASI business. The only exceptions are Toll/Bart/Muni/parking meter/public telephone costs which are reimbursable without receipts.

Reimbursements will not exceed the necessary and reasonable amount as determined by the Controller. If there is any question about these provisions, please obtain authorization from the Chief Financial Officer in advance of the travel to ensure that reimbursement above these rates will be allowed.

Non-Allowable and Non-Reimbursable Costs: The following items will not be reimbursed unless highly unusual circumstances have occurred and written pre-approval was obtained from the Chief Financial Officer.

Type	Examples
Travel/Transportation	<ul style="list-style-type: none"> • Unjustified car rental and/or upgrade from standard compact size vehicle. • Auto/flight/travel insurance. • Air travel ticket higher than coach/economy class. • Parking/moving violation tickets or other penalties for infractions of any law, repair of automobiles and towing charges. • Passport application fees. • Unjustified cancelled travel tickets and change/cancellation costs.
Lodging	<ul style="list-style-type: none"> • Unjustified lodging in excess of federal per diem rate. • Payment for accommodation with friends/relatives. • Unjustified lodging during training/meetings within the nine Bay Area counties. • Hotel movies. • Unjustified internet access.
Meals	<ul style="list-style-type: none"> • Reimbursement for meals unless travel is overnight and pre-approved as an exception by the Department Head or provided for in employee MOU. • Unjustified meal expenses in lieu of conference provided meals. • Alcoholic beverages.
Other Expenses	<ul style="list-style-type: none"> • Boarding cost of pets and children during business travel. • Excessive phone calls from hotels when traveling. • Personal laundry/dry clean for trips less than 7 days. • Significantly large tips.

QUESTIONS AND ANSWERS

Q: What is the policy regarding using the Fiscal Agent's approved vendors vs employee booking air travel directly?

A: Employees have the option of purchasing air tickets from the fiscal agent's approved vendor or on-line directly. If employees choose to purchase air travel on-line directly, they must document and demonstrate this option is the most economical by obtaining a comparative quote from a City vendor for the travel dates.

Q: Can I book air travel for other than coach/economy class?

A: No. Airfare should be coach/economy class only. Business class is not reimbursable. Upgrades are not reimbursable.

Q: If an airline charges for checked luggage, what is the policy for reimbursing baggage check-in expenses. What documentation is required?

A: The BAUASI will reimburse the cost of first checked bag only. Additional baggage check-in costs will be reimbursed with justification explaining the business need for extra luggage. Original receipt required for reimbursement.

Q: What expenditures are reimbursed when I drive personal vehicle, city vehicle, rental car?

A:

Mode of Transportation

- (a) Employee drives personal car
- (b) Employee drives city vehicle

Expenses Reimbursed

- (a) Mileage
- (b) Fuel expenses (with justification why employee was unable to obtain fuel from Central Shops)
- (c) Cost of car rental and gas expenses

- (c) Employee drives rental car

See "Transportation" section for additional information and requirements.

Q: Does my lodging receipt need to be itemized?

A: Yes, hotel lodging receipt must be itemized listing all expenses (room, tax, phone calls, etc.) separately. The receipt must also have a zero balance showing the payment was made. If a hotel bill with zero balance is not available, submit the itemized hotel bill along with a copy of credit card statement showing payment was made.

Q: If the conference hotel is not available (i.e. fully booked), can I stay at one of the conference provided list of recommended hotels or over flow hotels.

A: Yes, conference recommended hotels or overflow hotels with a conference rate will be reimbursed when documentation of the conference lodging rate and a receipt are provided. Reimbursement should be for single room rate.

Q: For domestic travel, what if a city is not listed on the CONUS Per Diem website?

A: If a city is not listed, check to ensure that the county within which it is located is also not listed. On the GSA website there is a link to the National Association of Counties which can help determine the county a destination is located in. If the city is not listed, but the county is, then the per diem rate is the rate for that entire county. If the city and the county are not listed, then that area is considered to be a Standard CONUS location which is currently \$70 for lodging.

Q: Can the BAUASI pay an employee's family/friends for lodging or other expenses when employee stays with family/friend during business travel?

A: No.

Q: When employees or travelers stay with family/friends during business travel and therefore do not incur lodging expense to the BAUASI, can employees or travelers be reimbursed for buying family/friends thank you flowers, or meal etc.

A: No.

Q: Can I claim meal per diem if I found the conference meals unhealthy or insufficient?

A: No.

Q: Is alcohol and/or corkage expense reimbursable?

A: No, alcohol/corkage reimbursement is not allowed.

Q: Can the employee or traveler be reimbursed for meals if the travel is for required training?

A: Yes, as long as the travel is overnight and the Chief Financial Officer has pre-approved the exception.

Q: For foreign travel, what if a location is not listed for per diem under the country employee is traveling to?

A: Any location not listed for per diem under a country takes the "Other" rate GSA administers and publishes for that country. An unlisted suburb of a listed location takes the "Other" rate, not that of the location of which it is a suburb.

Q: What is the BAUASI's policy for reimbursing internet, fax and phone calls for business?

A: Employees or travelers will be reimbursed for reasonable usage. Business purpose and justification of need must be documented and original receipts provided. Identify all business calls, faxes, etc. on the hotel bill.

Q: Can I combine personal travel with official business, i.e. personal travel before/after/or in between business trips?

A: Employee or traveler may combine personal travel with business travel when pre-approved in writing by the Chief Financial Officer. The BAUASI is responsible only for the official business portion of the trip. When travel on business is extended for personal reasons, before, in between, and/or after official business travel, no personal expenses can be included on the travel expense voucher claim form. Employee or traveler must obtain a quote from approved vendor of the fiscal agent showing the cost of roundtrip ticket for most economical and direct travel to/from the business destination for the dates of official business. This quote will be used for comparison and reimbursement purposes. Employee or traveler must pay for the personal portion of the airfare expense. When combining personal travel with official business travel, there is no reimbursement for lodging, meal per diem, or any other expense incurred before/in between/after the conference/official business starts /concludes.

Q: Is the \$5 incidental per diem given on travel days?

A: Yes, incidental per diem is allowed for travel as long as the trip is overnight and pre-approved as an exception by the Chief Financial Officer.

Q: What does incidental expense per diem include?

A: Transportation between places of lodging or business and places where meals are taken, if suitable meals cannot be obtained within walking distance of the conference/training site or hotel; Fees and tips given to porters, baggage carriers, bellhops, hotel maids and stewards; Mailing costs associated with filing travel vouchers.

Q: When on foreign travel for official business, what does the M&IE incidental cover?

A: Separate amounts are established for lodging and meals plus incidental travel expenses (M&IE). The maximum lodging amount is intended to substantially cover the cost of lodging at adequate, suitable and moderately-priced facilities. The M&IE portion is intended to substantially cover the cost of meals and incidental travel expenses such as laundry and dry cleaning.

Q: For international business travel, are passports and visas reimbursable expenses?

A: Visas are reimbursed with original receipt. Passport expenses are not reimbursable.

Q: What documentation do I need to provide for currency conversion when foreign/ international travel for official business?

A: International travel expenses must be converted to U.S. dollars. Conversion rate should be calculated for the date the expense was incurred. Include proof of the currency exchange rate. Proof can be in the form of (1) receipts obtained by the employee during travel or (2) a copy of the

employee's credit card statement showing the travel expense or (3) a print out from the OANDA.com website or other conversion website using the date shown on the receipt(s).

Q: If an employee or traveler pays for conference registration in advance can they be reimbursed before the conference date?

A: No, all employee reimbursements should be approved after the conference has completed.

Q: Am I required to provide printouts from an online map service such as Google Maps or MapQuest to be reimbursed for mileage?

A: No, only odometer readings are required by the Grant Management Unit, as long as the mileage is reasonable.

APPENDICES

- A. BAUASI Travel & Expense Authorization
- B. BAUASI Field Expense Report

