



**POLICE DEPT.**

# Memo

To: City Council  
From: Leo Moreno, Police Captain  
Date: April 23, 2026  
Re: Item 7C – Exhibits to Attachment

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Mayor and City Council,

Staff inadvertently omitted Exhibits B and C from Attachment 1 to Item 7C. They are included attached to this memorandum.

**ATTACHMENT B — SUBAWARD REQUIREMENTS**  
**(Scope & Program Conditions)**

The following operational requirements apply to SUBRECIPIENT’s SHSGP-funded project(s). COUNTY may update deliverable deadlines by written notice to SUBRECIPIENT to align with Cal OES or DHS/FEMA changes.

**A. Reporting.**

Performance Reports are due: **May 31**, 2026 or as subsequently noticed in writing by COUNTY. Reports shall be submitted to COUNTY via email to [annie.puckett@santacruzcountyca.gov](mailto:annie.puckett@santacruzcountyca.gov).

**B. Procurement.**

SUBRECIPIENT shall follow the more stringent of its documented local procurement procedures or 2 C.F.R. §§ 200.317–200.327. Any noncompetitive procurement requires prior written approval from COUNTY and Cal OES with [supporting documentation](#).

**C. Training & Exercises.**

All grant-funded training requires Cal OES prior approval with a [Training Request Form](#); obtain a Training Feedback Number at least thirty (30) calendar days before the first day of the training or related activities, with course materials/agenda attached. Exercises conducted with SHSGP funds must be reported; an AAR/IP or summary report (for seminars/workshops) is due to Cal OES within ninety (90) calendar days of completion.

**D. Environmental & Historic Preservation (EHP)**

Projects or activities with potential environmental or historic impacts require [FEMA EHP screening](#) and written approval prior to commencement of the funded activity.

**E. Equipment**

Equipment must be on the FEMA [Authorized Equipment List \(AEL\)](#). Prohibited: weapons and weapon accessories. Restrictions apply to pharmaceuticals, medical countermeasures, and critical emergency supplies. Video surveillance, telecommunications, and unmanned aerial systems produced by, owned by, or otherwise connected to the People’s Republic of China are prohibited. Asset tagging and inventory are required; disposal of federally funded equipment requires prior approval.

**F. Project Modifications**

Budget or scope changes require formal approval; SUBRECIPIENT may implement modification activities only after receiving written final approval from Cal OES (and DHS/FEMA as required for [National Priority projects](#)).

**G. Reimbursement**

This is a cost-reimbursement subaward. Requests must include invoice(s), proof of payment, proof of receipt (e.g., packing slips and photos showing asset tags) for equipment, procurement documentation where applicable, and payroll/time documentation for personnel or consultants. Subrecipients are encouraged to submit no later than **May 1, 2026**. COUNTY shall remit reimbursement payment to SUBRECIPIENT within thirty (30) calendar days following COUNTY's receipt and acceptance of a complete invoice package, subject to the terms and conditions of subaward requirements.

**H. Closeout & Disposition**

Subrecipient shall provide all financial and performance documentation necessary for COUNTY to meet federal and state close-out deadlines, including equipment disposition requests where applicable.

**I. Termination Triggers**

Failure to submit required reports; failure to expend funds in accordance with milestones/guidance; failure to comply with subaward requirements or applicable local, state, or federal law; false certification; or failure to adequately manage, monitor, or direct grant activities may result in suspension or termination, withholding of funds, cost disallowance, and repayment.

## **ATTACHMENT C — FEDERAL & STATE GRANT ASSURANCES**

SUBRECIPIENT shall comply with all applicable federal and state requirements, all incorporated into this Contract by reference, including without limitations the following:

1. 2 C.F.R. Part 200 (Uniform Guidance): internal controls (§ 200.303); procurement (§§ 200.317–200.327); cost principles (Subpart E); remedies (§ 200.339); records (§ 200.334); closeout (§ 200.344); domestic preferences (§ 200.322); and the telecommunications/video surveillance prohibition (§ 200.216).
2. Civil Rights and Nondiscrimination: Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act; Age Discrimination Act; and Executive Order 13166 (Limited English Proficiency).
3. Debarment/Suspension: 2 C.F.R. Part 180 (and 2 C.F.R. Part 3000, as applicable); Subrecipient and its principals are not debarred or suspended; verification via SAM.gov shall be maintained. UEI and SAM registration shall be maintained per 2 C.F.R. Part 25.
4. Anti-Lobbying: Byrd Anti-Lobbying Amendment (31 U.S.C. § 1352) and submission of certifications as applicable.
5. Drug-Free Workplace Act of 1988.
6. Federal Funding Accountability and Transparency Act (FFATA) (2 C.F.R. Part 170), as applicable.
7. DHS/FEMA Conditions: including FEMA EHP screening and written approval before commencement of any activity triggering EHP; adherence to the FEMA Authorized Equipment List (AEL); and prohibition on PRC-connected video surveillance, telecommunications, and UAS equipment.
8. Cal OES Program Conditions/Guidance: including training approvals and reporting (AAR/IP within 90 days), project modification approvals, equipment management and disposition, and closeout requirements.
9. Single Audit Act and 2 C.F.R. Subpart F: if Subrecipient's annual federal expenditures equal or exceed \$750,000, Subrecipient shall obtain a Single Audit and provide required reports.
10. Program Income and Equipment: any program income shall be used and accounted for consistent with 2 C.F.R. § 200.307; equipment acquisition, use, and disposition shall comply with 2 C.F.R. § 200.313.