

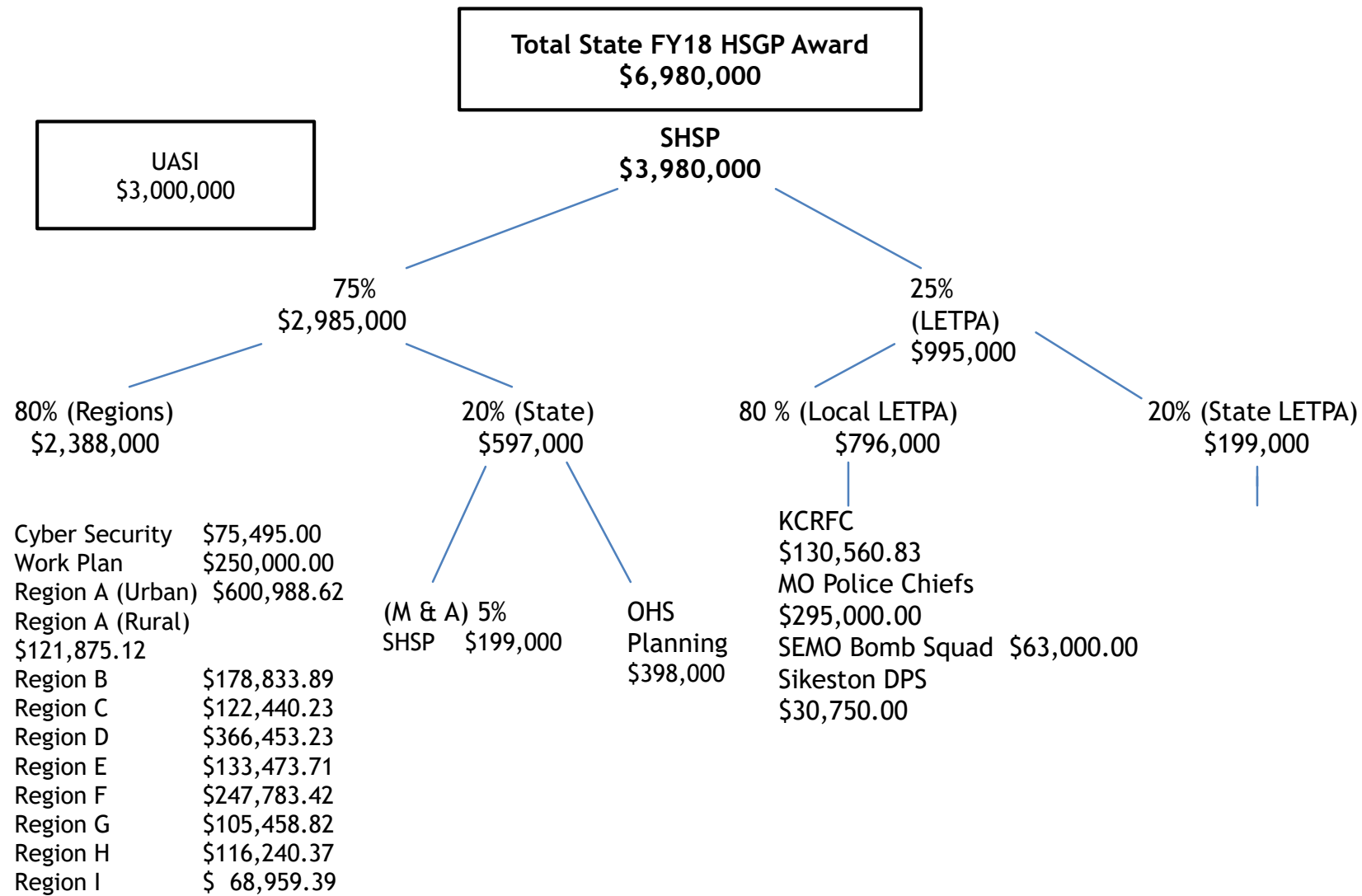


FY 2018 State Homeland Security Program

Grant Award and Compliance Workshop
September 26, 2018

Agenda

- ▶ Welcome
- ▶ Grant Compliance
- ▶ Updated Policies
- ▶ Activity - Claim
- ▶ Lunch
- ▶ Environmental Historical Preservation
- ▶ Pass-Through Requirements
- ▶ Monitoring
- ▶ Handout Awards



OHS will receive additional
M&A from the following:
UASI \$150,000
NSGP \$15,000



Michelle Branson, Grants Specialist

Grant Requirements and Procedural Updates

Missouri Office of Homeland Security, Division of Grants (OHS) Administrative Guide and Information Bulletins (IB)

- ▶ The Administrative Guide for Homeland Security Grants
- ▶ Information Bulletins:
 - ▶ OHS-GT-2012-001 - Policy on Monitoring Subrecipient Reporting, Recordkeeping and Internal Operation and Accounting Control Systems
 - ▶ OHS-GT-2012-002 - Policy on Advance Payment & Cash Advances
 - ▶ OHS-GT-2012-003 - Policy on Funding Restrictions for Management and Administration Costs
 - ▶ OHS-GT-2012-004 - Policy on Food and/or Beverage Provided for Homeland Security Training/Exercise Sessions, Meetings, or Conferences

Missouri Office of Homeland Security, Division of Grants (OHS) Administrative Guide and Information Bulletins (IB) - Cont.

- ▶ OHS-GT-2012-005 - Policy on Claim Request Requirements Including OHS Reimbursement Checklist
- ▶ OHS-GT-2012-006 - Policy on Utilization of the Training Request Form for Approved and Non-Approved Training
- ▶ OHS-GT-2018-008 - Policy on Budget Modifications, Scope of Work Changes, and Spending Plans
- ▶ OHS-GT-2018-009 - Policy for Requirements of Subrecipient Pass-through Entities
- ▶ The Administrative Guide for Homeland Security Grants and IB's can be located on the Department of Public Safety (DPS) website
<https://dps.mo.gov/dir/programs/ohs/grantstraining/>

Federal Grant Requirements

- ▶ Code of Federal Regulations 2 CFR Part 200 the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl
 - ▶ Regulations provide the foundational requirements for federal financial assistance
- ▶ Subrecipients are required to comply with the programmatic requirements of The U.S. Department of Homeland Security (DHS), Notice of Funding Opportunity (NOFO), Fiscal Year 2018 Homeland Security Grant Program (HSGP) <https://www.fema.gov/homeland-security-grant-program>
 - ▶ Provides programmatic requirements specific to the State Homeland Security Program (SHSP)
- ▶ Grant Programs Directorate (GPD) Information Bulletins (IBs) <https://www.fema.gov/grant-programs-directorate-information-bulletins>
 - ▶ The IBs provide administrative instructions and guidelines critical to supporting the effectiveness and efficient delivery of the grant

Subaward Agreements

- ▶ Subaward Agreements will be distributed at the conclusion of the training
 - ▶ Original signed Subaward Agreement must be mailed to the OHS
 - ▶ **Due October 31, 2018**
- ▶ OHS will upload executed subaward agreements to WebGrants
 - ▶ Subrecipients may retrieve a copy of the executed subaward agreement from the Subaward Documents - Final section in WebGrants. A copy of the executed Subaward Agreement must be added to the subrecipient's grant file

FY 2019 Threat Hazard Identification and Risk Analysis (THIRA)

- ▶ Provide THIRA update tri-annually, due in 2019
- ▶ Maintain an up-to-date THIRA
- ▶ Organize and facilitate all meetings necessary to update the THIRA
- ▶ Instructions will be provided from the OHS at a later date

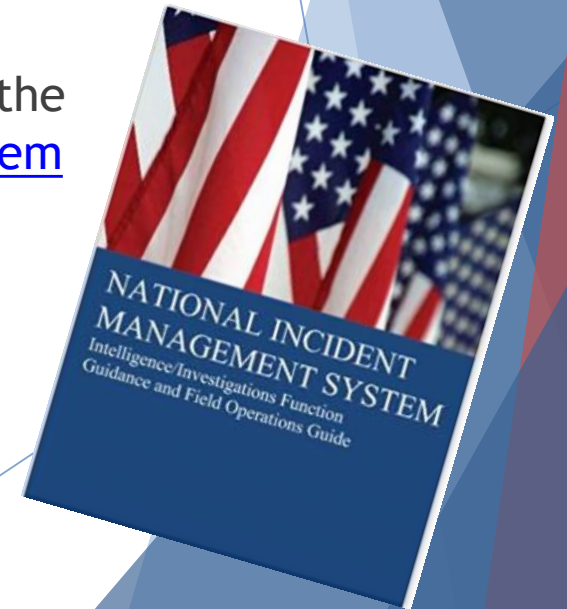
Emergency Operations Plan

- ▶ All subrecipients that maintain an Emergency Operations Plan (EOP)
 - ▶ Must update EOP once every two years
 - ▶ Conform to guidelines outlined in CPG 101 v.2.0, developing and maintaining EOP
 - ▶ Subrecipients that are pass-through entities are required to monitor their subrecipients to verify EOP's are up to date
 - ▶ If an EOP is not currently in place, you do not have to create one, but if there is an EOP in place, it must be updated



National Incident Management System (NIMS)

- ▶ All subrecipients must strive to be NIMS compliant and adhere to the prescribed mandates and principles
- ▶ NIMS is a systematic, proactive approach to guide departments and agencies at all levels of government, nongovernmental organizations (NGO), and the private sector in working together seamlessly and managing incidents involving all threats and hazards—regardless of cause, size, location, or complexity—in order to reduce loss of life, loss of property, and harm to the environment. <http://www.fema.gov/national-incident-management-system>



Procurement Requirements

- ▶ With any expenditure, the subrecipient shall ensure that:
 - ▶ The expenditure is an approved budget line item
 - ▶ Prior approval has been obtained, if necessary
 - ▶ Sufficient funds are in the approved budget line
 - ▶ Subrecipients must have their own written procedures for determining costs are allowable, reasonable, allocable and necessary in accordance with Subpart E - Cost Principles and the terms and conditions of the Federal award (2 CFR Part 200.302 (7)). Agencies that do not have their own written policy, may adopt the OHS' Appendix B found in the Administrative Guide for Homeland Security Grants
- ▶ If a subrecipient is uncertain as to whether a cost meets these requirements, please contact the OHS for clarification

Subrecipient Procurement Policy Requirements

- ▶ If a subrecipient has a procurement policy, a copy must be submitted and accepted by the OHS
 - ▶ If the subrecipient does not have a procurement policy, or their policy is less restrictive than the State of Missouri policy, they must follow the State of Missouri's Procurement Guidelines
 - ▶ State of Missouri Revised Statutes Chapter 34, State Purchasing and Printing
<http://revisor.mo.gov/main/OneChapter.aspx?chapter=34>
 - ▶ Missouri Rules of Office of Administration Division 40 - Purchasing and Materials Management
<https://www.sos.mo.gov/cmsimages/adrules/csr/current/1csr/1c40-1.pdf>
 - ▶ Cooperative Procurement Option
<https://oa.mo.gov/purchasing/cooperative-procurement-program>

Single Feasible Source

- ▶ Use of single feasible source procurement is discouraged. A single feasible source procurement exists when:
 - ▶ Supplies are proprietary and only available from the manufacturer or a single distributor; or
 - ▶ Based on past procurement experience, it is determined that only 1 distributor services the region in which the supplies are needed; or
 - ▶ Supplies are available at a discount from a single distributor for a limited period of time
- ▶ Use of a single feasible source procurement of \$3,000.00 or more requires prior approval from the OHS
 - ▶ A single feasible source form can be located on the DPS website <https://dps.mo.gov/dir/programs/ohs/grantstraining/>

Who Are You Doing Business With?

- ▶ Subrecipients are required to verify that vendors used for grant purchases are not on either the Federal Excluded Parties List System (EPLS) or State Suspended/Debarred Vendors List
 - ▶ Federal System for Award Management
<https://sam.gov/portal/SAM/#1>
 - ▶ State of Missouri Office of Administration
<http://oa.mo.gov/sites/default/files/suspven.pdf>



Prior Approval

- ▶ Some items require prior approval from the OHS, including, but not limited to:
 - ▶ Contracts
 - ▶ Single Feasible Source
 - ▶ Projects requiring an Environmental Planning and Historic Preservation (EHP)
 - ▶ Items that require a federal waiver can be located in the IBs
 - ▶ Boats
 - ▶ Unmanned Aerial Vehicles
 - ▶ Explosives

Audit Requirements

- ▶ State and local units of government, institutions of higher education, and other nonprofit institutions, must comply with the organizational audit requirements of 2 CFR Part 200 Subpart F, Audit Requirements
 - ▶ Subrecipients who expend \$750,000 or more of federal funds during their fiscal year are required to submit a single organization wide financial and compliance audit report (single audit) to the Federal Audit Clearinghouse within 9 months after the close of each fiscal year during the term of the award
<https://harvester.census.gov/facweb/>

Equipment

- ▶ Equipment is defined as tangible, personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost of \$1,000 or more
- ▶ Entities may have a lower acquisition cost in their procurement policy. If so, they **MUST** use the most stringent policy
- ▶ Equipment must be available for use on other projects or incidents provided it will not interfere with the work on the project for which it was originally acquired



Equipment – Cont.

- ▶ Equipment must be protected against loss, damage and theft
 - ▶ Per 2 CFR 200.310: The non-Federal entity must, at a minimum, provide the equivalent insurance coverage for real property and equipment acquired or improved with Federal funds as provided to property owned by the non-Federal entity
- ▶ Investigate all incidents of loss, damage, theft, and report to the OHS within 30 days
- ▶ Equipment must be maintained to keep it in mission capable (operational) condition

Equipment Disposition

- ▶ When original or replacement equipment acquired with HS funds is no longer needed for the original project or program, the equipment may be retained, sold, or disposed, if it is not needed in any other HS sponsored project or program
- ▶ Subrecipients must request approval from the OHS prior to disposing of equipment. Procedures in the OHS Administrative Guide for Homeland Security Grants must be followed to request disposition approval
- ▶ Copy of the approved Equipment Disposition Form must be maintained in the subrecipient grant file
- ▶ Equipment Disposition Form can be located on the DPS website <https://dps.mo.gov/dir/programs/ohs/grantstraining/>



Inventory

- ▶ Subrecipients must have an inventory management system
- ▶ Physical inventory must be taken and results reconciled at least once every 2 years
- ▶ Next physical inventory due **October 1, 2018**



WebGrants Project Management

- ▶ Subrecipients with a multi-project grant will have each project set up individually in WebGrants
- ▶ Projects will be accessible under My Grants
- ▶ Each project will have a unique identifier to differentiate it from other projects

- ▶ Subrecipient Grant Number

- ▶ ((EMW-2018-SS-00044) - (XX)) - (XX)

Federal Grant Number

Subrecipient Identifier

Project Identifier

Project Management

- ▶ Budget will be set up by project
- ▶ Applications will be accessible with each project
- ▶ Claims, Subaward Adjustments, and Status Reports will be completed by project
- ▶ Projects must be closed as they are completed
- ▶ Grant final close out will be completed when all projects are closed



Status Reports

- ▶ Status Reports must be completed through WebGrants
- ▶ Due Dates
 - ▶ January 10 (July 1 - December 31)
 - ▶ July 10 (January 1 - June 30)
- ▶ Status Reports must be completed on a per project basis
- ▶ Final Status Reports must be completed for each project as they are completed

Status Reports – Cont.

- ▶ Milestones will continue to be used as a reporting mechanism in the Status Report
- ▶ OHS will provide the initial milestones
 - ▶ Subrecipient may request a change to milestones, if necessary
- ▶ On the initial Status Report, for each project, subrecipients will be required to provide the Estimated Date of Completion for all milestones
- ▶ All Status Reports must include:
 - ▶ Updated estimated date of completion
 - ▶ Percentage of each milestone completed
 - ▶ Milestone Progress notes
 - ▶ Narrative project progress

Status Reports – Cont.

- ▶ Percent of milestone completed (10% increments)

% Milestone Completed 
Select the % this milestone is completed.

- ▶ Milestone Progress is for notes specific to that milestone

Milestone:	Project Name:	Estimated Completion Date:	% Milestone Completed	Milestone Progress:
1. Determine specifications for needed equipment	SCBA Tank Replacement	09/18/2018	100%	Specifications completed

- ▶ Narrative Project Progress section should include:
 - ▶ Anticipated accomplishments in the next 6 months
 - ▶ Project accomplishments to be highlighted
 - ▶ Negative issues that need to be highlighted
 - ▶ This should include why any milestone estimated completion dates have changed from the previous Status Report

Status Reports - Cont.

Instructions

As per HSGP grant guidance, the Status Report is required to demonstrate the progress of your grant for the prior six month period. The OHS staff will report the information provided to the Regional Homeland Security Committee (RHSOC) and Homeland Security Advisory Committee (HSAC).

Milestone Progress

[Create New Version](#) | [Mark as Complete](#) | [Go to Status Report Forms](#) | [Add](#)

Milestone:	Project Name:	Estimated Completion Date:	% Milestone Completed	Milestone Progress:
1. Determine specifications for needed equipment	SCBA Tank Replacement		0%	
2. Procurement Completed: bidding, vendor selection, and ordering of equipment	SCBA Tank Replacement		0%	
3. Equipment received, installed, tested and inventoried	SCBA Tank Replacement		0%	
4. Vendor paid and receipt of proof of payment received	SCBA Tank Replacement		0%	
5. WebGrants reimbursement completed with all necessary documentation	SCBA Tank Replacement		0%	
6. Equipment training completed	SCBA Tank Replacement		0%	
7. Local monitoring completed	SCBA Tank Replacement		0%	
8. Project closed out	SCBA Tank Replacement		0%	

Narrative Project Progress

[Add](#)

Project Name:	What do you anticipate accomplishing in the project over the next six months? Do you have any project accomplishments to be highlighted? Are there any negative issues that need to be highlighted?
SCBA Tank Replacement Project	

Last Edited By: Michelle Branson, 09/19/2018

Subaward Adjustments

- ▶ New IB OHS-GT-2018-008 - Policy on Budget Modifications, Scope of Work Changes, and Spending Plans
- ▶ The purpose of the new IB is to assist local governments, state agencies and nonprofits in understanding the requirements when requesting budget modifications and scope of work changes for existing grants



Subaward Adjustment – Cont.

- ▶ Subaward Adjustments are required for:
 - ▶ Budget modifications
 - ▶ Scope of Work Changes
 - ▶ Adding a new project to the grant award
 - ▶ Adding new line items to the approved project budget
 - ▶ Changes in the quantity of an existing line item in the approved project budget
 - ▶ Changes to the specifications of an existing line item in the approved project budget
 - ▶ All scope of work changes must be requested at least 90 days prior to the end of the grant period of performance
- ▶ Subaward Adjustments must be submitted through WebGrants and approved by the OHS **prior** to grant funds being obligated

Subaward Adjustment – Cont.

► Example

► Spreadsheet

Line Number	Current Budget	Requested Change	Updated Budget	Notes
10001	\$ 10,000.00	\$ (1,500.00)	\$ 8,500.00	Equipment Purchased, actual cost under budget
11001	\$ 3,000.00	\$ 1,500.00	\$ 4,500.00	Additional funds needed for supplies, need additional filters for SCBA units.
Totals	\$ 13,000.00	\$ -	\$ 13,000.00	

► Justification in WebGrants

Justification*

Please explain the reason for the requested adjustment and include the effective date. State the need for the change and how the requested revision will further the objectives of the project.

Due to savings in the actual cost of the SCBA tanks we would like to request to use the remaining funds to purchase additional SCBA filters. These filters are needed due to extra deployments of SCBA units this year. Please see requested changes to the budget below:

Line Number	Current Budget	Requested Change	Updated Budget	Notes
10001	\$ 10,000.00	\$ (1,500.00)	\$ 8,500.00	Equipment Purchased, actual cost under budget
11001	\$ 3,000.00	\$ 1,500.00	\$ 4,500.00	Additional funds needed for supplies, need additional filters for SCBA units.
Totals	\$ 13,000.00	\$ -	\$ 13,000.00	

Subaward Adjustment - Cont.

- ▶ New requirements
 - ▶ Only one Subaward Adjustment may be submitted per quarter, per project
 - ▶ A waiver may be requested for extenuating circumstances
 - ▶ A Subaward Adjustment may not be submitted until the prior adjustment is in approved status

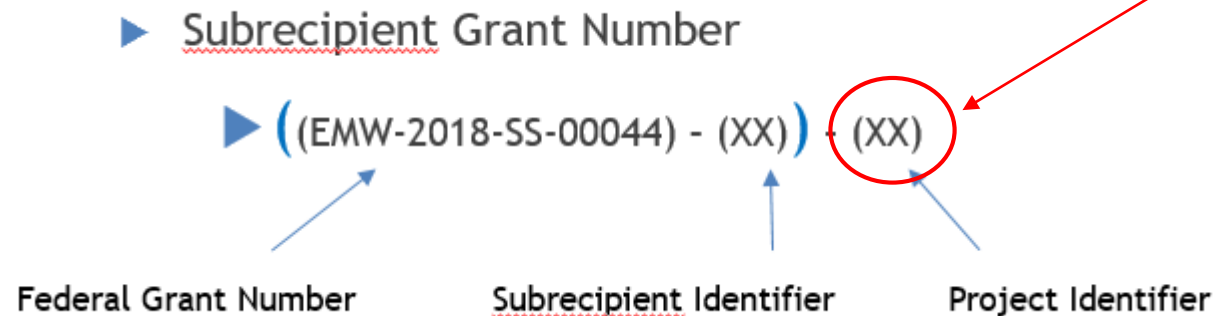


Regionalization Subaward Adjustment Requirements

- ▶ RHSOC must approve Subaward Adjustment changes prior to submitting the request in WebGrants
 - ▶ Exception: if the request is to move funds between existing budget lines within a project to account for budget vs. actual costs and does not in any way change the scope of the approved project
- ▶ Subaward Adjustments are due each quarter after each RHSOC meeting
 - ▶ Due Dates: May 31st, August 31st, November 30th, February 28th
- ▶ Documentation showing RHSOC approval must be attached to the Subaward Adjustment request

Regionalization Subaward Adjustment Requirements - Cont.

- ▶ Moving funds from one project to another will require a Subaward Adjustment to be submitted for each project
 - ▶ Use Project Identifier to distinguish between projects



Regionalization Subaward Adjustment Requirements - Cont.

► Example

► Spreadsheet

Project Number	Line Number	Current Budget	Requested Change	Updated Budget	Notes	
	4	10001	\$ 15,000.00	\$ (1,200.00)	\$ 13,800.00	Actual Costs Under Budget
	4	10003	\$ 8,000.00	\$ (4,000.00)	\$ 4,000.00	Actual Costs Under Budget
	4	10004	\$ 20,000.00	\$ (300.00)	\$ 19,700.00	
Sub Total		\$ 43,000.00	\$ (5,500.00)	\$ 37,500.00		
	8	9001	\$ 1,000.00	\$ 150.00	\$ 1,150.00	Actual Costs Over Budget
	8	11001	\$ 1,500.00	\$ (300.00)	\$ 1,200.00	Actual Costs Under Budget
Sub Total		\$ 2,500.00	\$ (150.00)	\$ 2,350.00		
	10	10001	\$ 10,000.00	\$ 3,000.00	\$ 13,000.00	Need Additional Item
	10	10006	\$ 15,000.00	\$ 1,800.00	\$ 16,800.00	Actual Costs Over Budget
	10	11002	\$ 100.00	\$ 850.00	\$ 950.00	Need Additional Items
Sub Total		\$ 25,100.00	\$ 5,650.00	\$ 30,750.00		
Total		\$ 70,600.00	\$ -	\$ 70,600.00		

Regionalization Subaward Adjustment Requirements - Cont.

► Example Justification

Justification*

Please explain the reason for the requested adjustment and include the effective date. State the need for the change and how the requested revision will further the objectives of the project.

The following requests were approved at the July 2018 RHSOC meeting (signed meeting minutes attached):

Project #4 - Project Sample 2018

All items for this project have been purchased, the project has a surplus of \$5,500.00

Project #8 - Project Sample 2018 A

All supplies for this project have been purchased and have come in under budget, the cost for travel will be over the estimated amount. After using the surplus from supplies to cover the additional travel costs there will be a surplus in this project of \$150.00

Project #10 - Project Sample 2018 B

This project was not fully funded at the beginning of the grant cycle due to lack of funds. The RHSOC has voted to use surplus funds from other projects to pay for additional items, as well as items the overage on the original budget for this project.

Please see budget revisions below:

Project Number	Line Number	Current Budget	Requested Change	Updated Budget	Notes
	4	10001 \$ 15,000.00	\$ (1,200.00)	\$ 13,800.00	Actual Costs Under Budget
	4	10003 \$ 8,000.00	\$ (4,000.00)	\$ 4,000.00	Actual Costs Under Budget
	4	10004 \$ 20,000.00	\$ (300.00)	\$ 19,700.00	
Sub Total		\$ 43,000.00	\$ (5,500.00)	\$ 37,500.00	
	8	9001 \$ 1,000.00	\$ 150.00	\$ 1,150.00	Actual Costs Over Budget
	8	11001 \$ 1,500.00	\$ (300.00)	\$ 1,200.00	Actual Costs Under Budget
Sub Total		\$ 2,500.00	\$ (150.00)	\$ 2,350.00	
	10	10001 \$ 10,000.00	\$ 3,000.00	\$ 13,000.00	Need Additional Item
	10	10006 \$ 15,000.00	\$ 1,800.00	\$ 16,800.00	Actual Costs Over Budget
	10	11002 \$ 100.00	\$ 850.00	\$ 950.00	Need Additional Items
Sub Total		\$ 25,100.00	\$ 5,650.00	\$ 30,750.00	
Total		\$ 70,600.00	\$ -	\$ 70,600.00	

Spending Plan

- ▶ A spending plan, for each open project, must be submitted to the OHS 180 days prior to the end of the grant period of performance
- ▶ Spending plan must outline the status of the project and any planned or known changes to the project budget
- ▶ Changes identified in the Spending Plan must be submitted through a Subaward Adjustment by May 31st, approximately 90 days, prior to the end of the grant period of performance
- ▶ Scope of work changes must be submitted 90 days prior to the end of the grant period



What's
the
plan?

Claims

- ▶ OHS grants are reimbursement grants. Approved expenditures must be made within the grant period of performance
- ▶ Claims must be submitted through WebGrants to request reimbursement
- ▶ Supporting documentation must be submitted with each claim
 - ▶ IB OHS-GT-2012-005 - Policy on Claim Request Requirements Including OHS Reimbursement Checklist
- ▶ Incomplete claims will result in a delay of payment. It is the requesting agency's responsibility to complete the necessary changes
- ▶ Reimbursements will now require copies of cancelled checks



Claims – Cont.

- ▶ Claims must be submitted and paid one at a time. A **new claim must not be submitted until the prior claim is in paid status**
 - ▶ Incomplete claims will be negotiated for necessary corrections. Subrecipient must make the corrections and resubmit for approval and payment, prior to submitting the next claim
- ▶ In the Claim Expenditure Form, a line must be completed for each individual expenditure
 - ▶ Multiple invoices on one expenditure line will not be accepted. However, each item purchased on an invoice does not need to be listed separately unless the items are on different lines in the approved budget

Claims - Cont.

- ▶ Expenditure form
 - ▶ Incorrect

Expenditures							Create New Version Go to Claim Forms Add			
Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
1001	RPC/COG	M&A Personnel May - June (all staff)	1.0	\$5,000.00	\$5,000.00	\$5,000.00	1	07/01/2018	Multiple	Multiple
						\$5,000.00				

- ▶ Correct

Expenditures						Create New Version Go to Claim Forms Add				
Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
1001	RPC/COG	Jane Smith May	1.0	\$1,500.00	\$1,500.00	\$1,500.00	1	07/01/2018	123	05/30/2018
1001	RPC/COG	Jane Smith June	1.0	\$1,500.00	\$1,500.00	\$1,500.00	3	06/30/2018	125	06/30/2018
1001	RPC/COG	Jack Jones May	1.0	\$1,000.00	\$1,000.00	\$1,000.00	6	05/30/2018	124	05/30/2018
1001	RPC/COG	Jack Jones June	1.0	\$1,000.00	\$1,000.00	\$1,000.00	7	06/30/2018	126	06/30/2018
						\$5,000.00				

Claims – Cont.

► Expenditure Form

► Incorrect

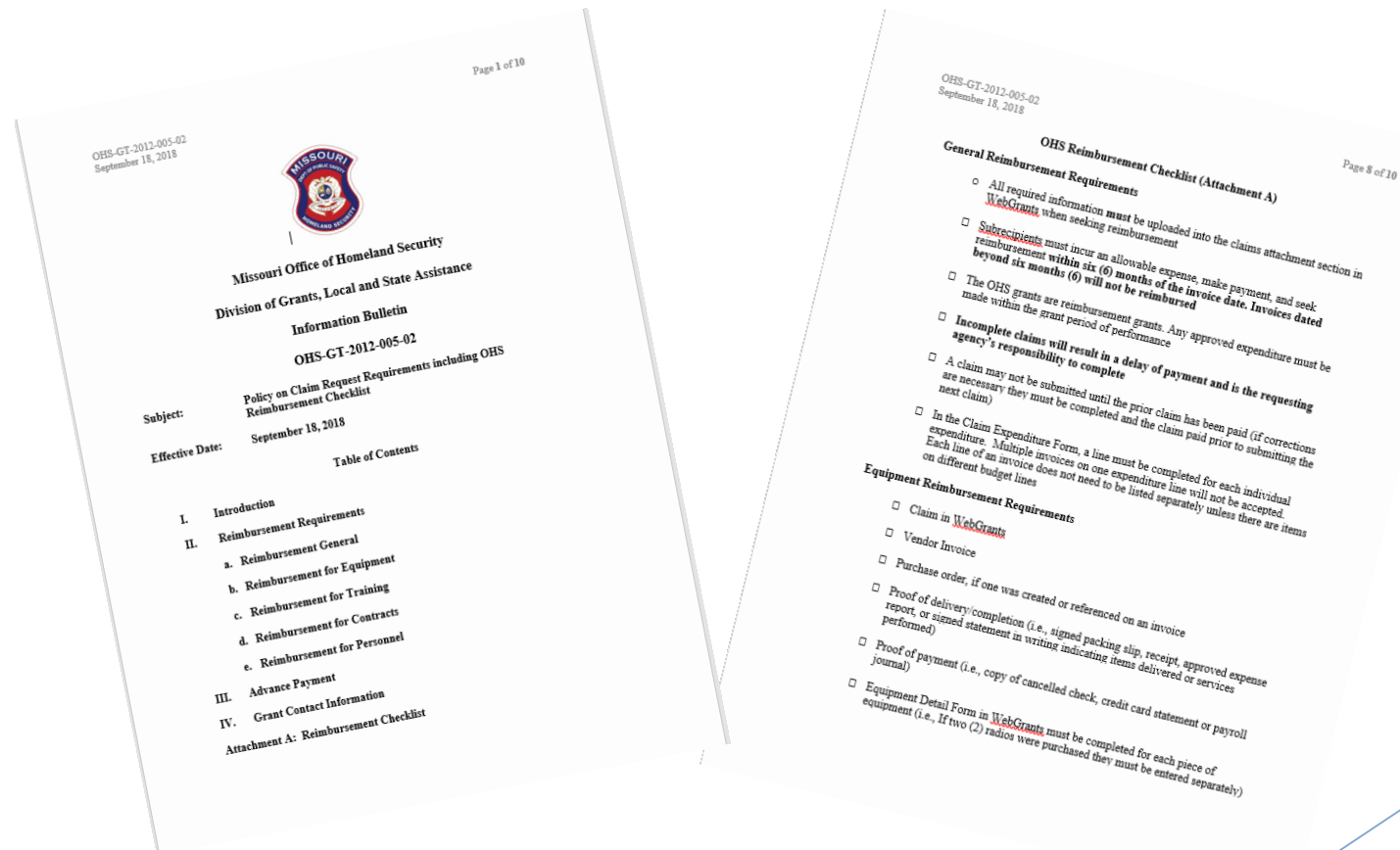
Expenditures										
Create New Version Mark as Complete Go to Claim Forms Add										
Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
10001	ACME Inc.	SCBA Tanks	10.0	\$1,000.00	\$10,000.00	\$10,000.00	123/456	06/01/2018 and 07/03/2018	130	07/05/2018
						\$10,000.00				

► Correct

Expenditures										
Create New Version Mark as Complete Go to Claim Forms Add										
Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
10001	ACME Inc.	SCBA Tanks	4.0	\$1,000.00	\$4,000.00	\$4,000.00	123	06/01/2018 and 07/03/2018	130	07/05/2018
10001	ACME Inc.	SCBA Tanks	6.0	\$1,000.00	\$6,000.00	\$6,000.00	456	07/03/2018	130	07/05/2018
						\$10,000.00				

Claims – Cont.

- ▶ Required documentation can be found in IB OHS-GT-2012-005 - Policy on Claim Request Requirements Including OHS Reimbursement Checklist



Activity

► What errors can you find?



Michelle Branson, Grants Specialist

Environmental Planning & Historic Preservation (EHP) Compliance

Projects Needing An EHP

- ▶ Projects that involve changes to the natural or built environment.
 - ▶ An EHP review is an analysis of pertinent project information to determine whether a project may have the potential to impact environmental or historical/cultural resources.
 - ▶ Including but not limited to: construction of communication towers; modification or renovation of existing buildings, structures, facilities, and infrastructure, new construction, replacement or relocation of facilities.
 - ▶ Any ground disturbances
 - ▶ Projects funded with HSGP Federal Grant dollars must comply.
 - ▶ Includes project on interior of buildings and facilities



Projects that Trigger EHP Review - Cont.

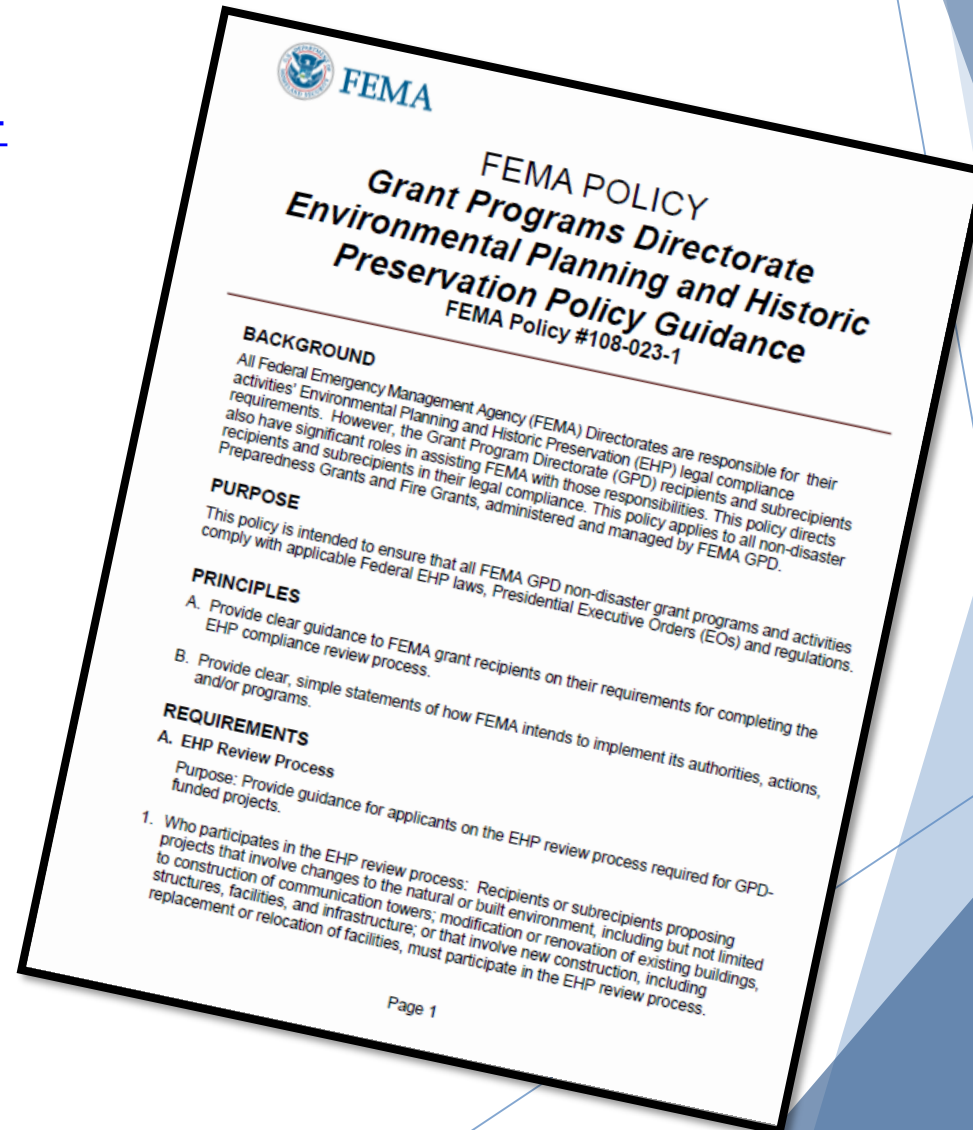
- ▶ The EHP review must be completed before initiating **ANY** work even if a previous award/year/program/project has an approved EHP review.

NO RETROACTIVE APPROVALS



New Policy Guidance August 15, 2018

www.fema.gov/grant-programs-directorate-policy



Projects that will NOT Require EHP Review

When upgrading communications systems or otherwise implementing communications projects, FEMA's recipients or subrecipients carry out a wide range of activities, from replacing and retuning mobile and portable equipment to replacing or upgrading fixed equipment to constructing communication facilities. GPD has identified several communications projects that will NOT require the submission of the [EHP Screening Form](#) or any other documentation. Those activities are:

- a. Software upgrades and/or retuning/reprogramming of existing equipment.
- b. Purchase of mobile and portable or plug-in equipment where no equipment requires permanent installation in or on existing buildings or structures.
- c. Replacement of components within existing consoles, sirens or radios.

Projects that will NOT Require EHP Review – Cont.

Purchase of Mobile and Portable Equipment (no installation): These are equipment devices that do not require any fixed installation and may be transported, such as hand-held radios, personal protective equipment (PPE), mobile/satellite phones, dive equipment, boats, response and mobile command vehicles, and other similar devices that do not require installation.



PLUG & PLAY



Projects that will NOT Require EHP Review – Cont.

b. Construction Projects Inside Buildings Less than Forty-Three Years of Age

As with exercises, drills, and trainings, the approval of facilities for construction projects at buildings that are less than forty-three years of age is done on a case-by-case basis with each recipient or subrecipient in the following manner:

- i. After an EHP screening form has been submitted for construction on the interior of a building that is less than forty-three years of age, and that project has been approved by GPD EHP, that facility can be considered “previously approved” for subsequent interior construction projects at that location.
- ii. All “previously approved facilities” under this definition will remain valid for an individual recipient, and its subrecipients, for the year in which a project has been approved plus two additional calendar years.
- iii. All proposed activities at the location that include exterior changes or ground disturbance do require submittal of an EHP screening form.

EHP Timeframe

- ▶ Complex projects typically require more information/time to reach a determination.

Timelines for the completion of the EHP review for each project will vary depending on the proposed project's complexity, the project grant application and supporting documents' completeness and accuracy, and the project's potential to impact environmental resources and/or historic properties. An EHP review may take 30 to 45 working days for proposed activities having little potential to impact environmental resources and/or historic properties; whereas a project that has the potential for significant impacts may take up to one year or more to review. During the project planning phase, recipients and subrecipients should consider these timelines and allot sufficient time for their projects' EHP reviews. Inadequate project descriptions or documentation of the presence of environmental resources and historic properties in a project site and surrounding project area may significantly delay the review timeliness and delay project implementation.

EHP Timeframe - Cont.

- ▶ FEMA may be required to consult with the relevant State Historic Preservation Office (SHPO), the U.S. Fish and Wildlife Service (FWS), the U.S. Army Corps of Engineers (USACE), and others to determine impacts to sensitive resources.



Please Note!

- ▶ Purpose of EHP review is to ensure compliance - **NOT** to deny or approve projects.
- ▶ Costs of environmental review (e.g., archeological surveys, reports, etc.) are responsibility of and paid by the grant subrecipient.



COMPLIANCE

EHP Packet

The EHP form can be located on the DPS website:

http://dps.mo.gov/dir/programs/ohs/documents/ohs-grant-application-forms/environmental_historical_protection_screening_form.docx

- ▶ Clear description of the project, including project location.
- ▶ Labeled, ground-level photos of the project area.
- ▶ Aerial photo(s).
- ▶ Includes the year built for any buildings/structures involved in the project.
- ▶ Describes extent (length, width, depth) of any ground disturbance.
- ▶ Includes any other pertinent EHP info (e.g., environmental studies/surveys, FCC info, permits in-hand, etc.).

Project Description Example

- ▶ Bad

- ▶ Install cameras in courthouse.

- ▶ Good

- ▶ Install 4 Panasonic VT-5 video cameras on first floor of 1898 county courthouse. Cameras will be installed opposite exit doors, 2 feet below drop ceiling (see diagram for location, position, and height). Wiring will use existing conduits..., etc.

EHP Supporting Photographs

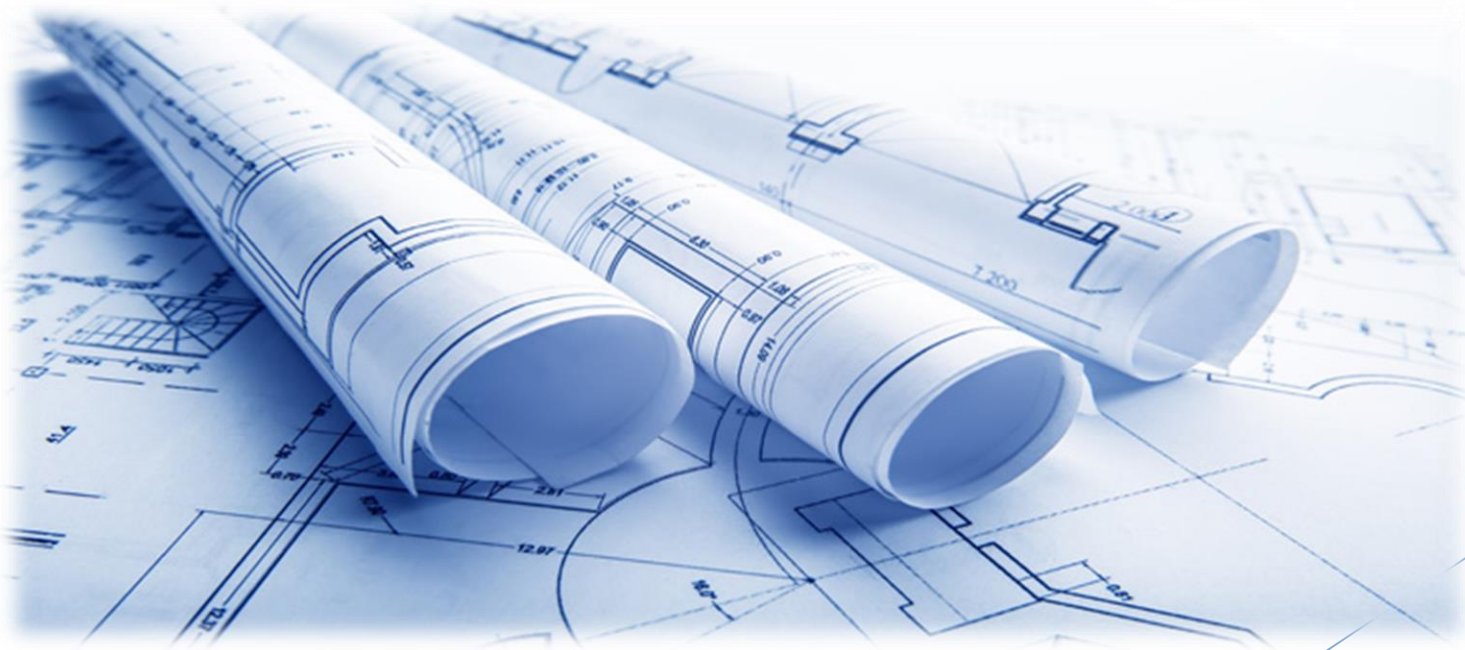
Required: site photographs, maps and drawings.

- ▶ Labeled, color, ground-level photographs of the project site.
- ▶ Labeled, color photograph of each location where equipment would be attached to a building or structure.
- ▶ Label all photographs with the name of facility, location (city/county, state) and physical location (physical address or latitude-longitude).
- ▶ Identify ground disturbance. Adding graphics to a digital photograph is a means to illustrate the size, scope and location of ground disturbing activities.
- ▶ Labeled, color aerial photograph of the project site.

EHP Supporting Photographs - Cont.

If Available:

- ▶ Labeled, color ground-level color photographs of the structure from each exterior side of the building/structure.
- ▶ Technical drawings or site plans.



EHP Photographs Examples

Example Photographs

Aerial Photographs. The example in Figure 1 provides the name of the site, physical address and proposed location for installing new equipment. This example of a labeled aerial photograph provides good context of the surrounding area.



Figure 1. Example of labeled, color aerial photograph.

EHP Photographs Examples - Cont.

Ground-level photograph with excavation area close-up. The example in Figure 4 shows the proposed location for the concrete pad for a generator and the ground disturbance to connect the generator to the building's electrical service. This information can be illustrated with either an aerial or ground-level photograph, or both. This example has the name and physical address of the project site.

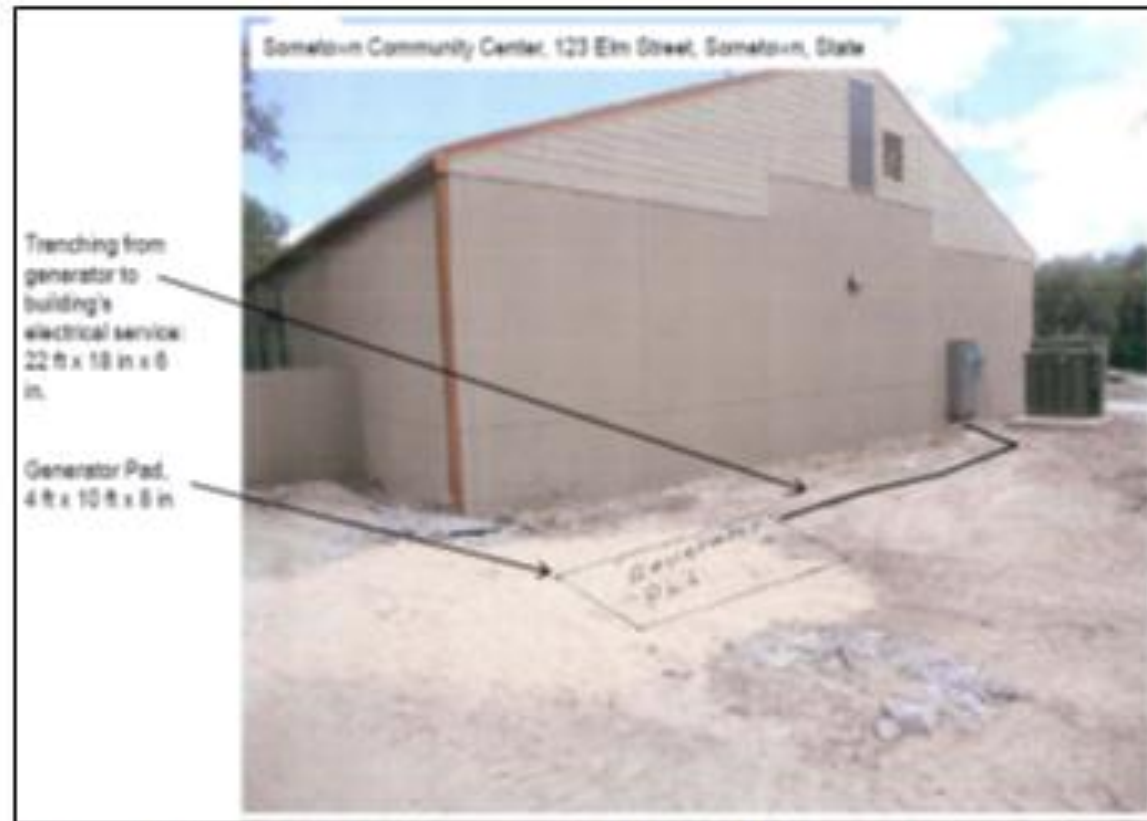


Figure 4. Ground-level photograph showing proposed ground disturbance area.

EHP Photographs Examples - Cont.

Ground-level photographs.

The ground-level photograph in Figure 2 supplements the aerial photograph in Figure 1, above. Combined, they provide a clear understanding of the scope of the project.

This photograph has the name and address of the project site, and uses graphics to illustrate where equipment will be installed.



Figure 2. Example of ground-level photograph showing proposed attachment of new equipment

EHP Photographs Examples - Cont.

Interior equipment photographs. The example in Figure 6 shows the use of graphic symbols to represent security features planned for a building. The same symbols are used in the other pictures where the same equipment would be installed at other locations in/on the building. This example includes the name of the facility and its physical address.

A camera will be added in the upper right corner and a proximity door access reader will be added for access control

Some County Sheriff Dept. 123 Elm Street,
Some Town, State



EHP Submission

The EHP packet needs to be completed and submitted early!!

**Projects started before clearance is issued will
NOT be reimbursed!**

- ▶ If the project scope changes, another EHP form must be approved prior to work beginning.
- ▶ Email forms to: theresa.stiles@dps.mo.gov.
- ▶ Questions: Theresa Stiles 573.301.2023.



Chelsey Call, Grants Specialist

Pass-Through Entities and Monitoring

Pass-Through Entities

- ▶ 2 CFR 200.74 defines a pass-through entity as a “non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.”
- ▶ 2 CFR 200.92 defines a subaward as an “award provided by a pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract

Who is a Pass-Through Entity?

- ▶ The Missouri Department of Public Safety, Office of Homeland Security, is a pass-through entity as subawards are issued to all RPC/COGs, LETPA subrecipients, and NSGP subrecipients
- ▶ Your agency is a pass-through entity if it receives a subaward from the OHS and subsequently passes funds, personnel costs, equipment, supplies, etc., to another entity



Pass-Through Entity Requirements

- ▶ 2 CFR 200.331 discusses pass-through entity requirements, which are listed below:
 - ▶ Risk Assessment
 - ▶ Subaward
 - ▶ Monitoring
- ▶ The OHS has released IB OHS-GT-2018-009 - Policy for Requirements of Subrecipient Pass-Through Entities for reference to the requirements listed above

Requirements



Subawards

- ▶ Pass-through entities are required to issue subawards as detailed in 2 CFR 200.331 (a)
- ▶ IB OHS-GT-2018-009 - Policy for Requirements of Subrecipient Pass-Through Entities also discusses subaward requirements
- ▶ Certain elements are required to be detailed in the subaward as discussed in 2 CFR 200.331 (a)
- ▶ The OHS maintains a subaward template that is available for use
- ▶ If the pass-through entity chooses to utilize their own subaward template, it must be approved by the OHS prior to issuance
- ▶ All Articles of Agreement in the subaward, issued to the pass-through entity, by the OHS, must be passed through to their subrecipient via the subward
- ▶ **Copies of signed subaward agreements are due to the OHS prior to the start of any project**

Subaward Modifications

- ▶ If any of the elements of the subaward change throughout the period of performance, a subaward modification or adjustment must be completed to update the subaward
 - ▶ For example:
 - ▶ Amount of award changes
 - ▶ Project period of performance changes
 - ▶ The OHS maintains a Grant Adjustment Notice (GAN) template that can be utilized for subaward modifications

Risk Assessments

- ▶ Risk assessment evaluates subrecipient risk of noncompliance to determine appropriate monitoring or additional special conditions
- ▶ 2 CFR 200.331 (b) discusses risk assessment requirements
- ▶ IB OHS-GT-2012-001-02 - Policy on Monitoring Subrecipient Reporting, Recordkeeping, and Internal Operation and Accounting Control Systems & IB OHS-GT-2018-009 - Policy for Requirements of Subrecipient Pass-Through Entities also discusses risk assessment requirements



Risk Assessments - Cont.

- ▶ Must be completed by pass-through entities for each subrecipient before a subaward is issued
- ▶ Evaluation of risk may include factors such as:
 - ▶ Prior experience
 - ▶ Previous audit conclusions
 - ▶ New personnel or new/changed time/accounting systems
 - ▶ Federal monitoring conclusions
 - ▶ Other

Risk Assessment Results

- ▶ The pass-through entity may choose to impose special conditions on the subrecipient's subaward based on the results of the risk assessment
- ▶ 2 CFR 200.207 discusses specific conditions the pass-through entity may impose such as:
 - ▶ Withholding authority to proceed to the next phase of a project until receipt of evidence of acceptable performance within a given period of performance
 - ▶ Requiring additional, more detailed financial reports
 - ▶ Requiring additional project monitoring
 - ▶ Requiring the non-Federal entity to obtain technical or management assistance
 - ▶ Establishing additional prior approvals
- ▶ Any special conditions imposed on the subrecipient should be included in the subaward Articles of Agreement

Subrecipient Monitoring

- ▶ Key things to remember about monitoring
 - ▶ Monitoring is **NOT** an audit
 - ▶ OHS is **NOT** out to catch you doing something wrong - we are there to **HELP** you
 - ▶ Help to correct areas of noncompliance to prevent audit findings
 - ▶ Chance to provide technical assistance and answer questions



Subrecipient Monitoring - Cont.

- ▶ Why do we have to monitor?
 - ▶ 2 CFR 200.328 (a) states, “The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable with applicable Federal requirements and performance expectations are being achieved.”
 - ▶ 2 CFR 200.331 (d) states, “all pass-through entities must monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.”

What Documents Guide Monitoring

- ▶ 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- ▶ DHS/FEMA Applicable Grant Program Guidance/NOFO
- ▶ DHS/FEMA Grant Program Directorate Information Bulletins
- ▶ Applicable State of Missouri statutes and regulations
- ▶ OHS Administrative Guide for Homeland Security Grants
- ▶ Applicable Articles of Agreement
- ▶ OHS Applicable Grant Program Guidance/NOFO
- ▶ Subaward Agreement
- ▶ OHS IBs

Types of Monitoring

- ▶ Desk Monitoring

- ▶ Review that is completed by the OHS or pass-through entity's office



- ▶ On-Site Monitoring

- ▶ Review that is conducted by the OHS or pass-through entity at the subrecipient's agency



What to Expect on Monitoring

- ▶ Scheduling
- ▶ Topics covered
- ▶ Corrective actions



Minimum Pass-Through Monitoring Standards

- ▶ IB OHS-GT-2012-001-02 - Policy on Monitoring Subrecipient Reporting, Recordkeeping, and Internal Operation and Accounting Control Systems discusses the minimum standards for pass-through monitoring
- ▶ All pass-through entities are required to have a monitoring policy that meets or is more stringent than the minimum standards
- ▶ Monitoring requirements for pass-through entities are dependent upon which entity is performing the procurement and purchasing

Minimum Pass-Through Monitoring Standards - Cont.

- ▶ If the pass-through entity performs all of the procurement and purchasing activities, the pass-through entity is required to monitor the following, as applicable:
 - ▶ Equipment
 - ▶ Personnel
 - ▶ Supplies
 - ▶ Contractual
 - ▶ EHP
 - ▶ Audit requirements
 - ▶ NIMS Compliance
 - ▶ Federal/State Civil Rights
 - ▶ Emergency Operations Plan (EOP)
 - ▶ Conflict of Interest Policy

Minimum Pass-Through Monitoring Standards - Cont.

- ▶ If the local subrecipient agency performs all of the procurement and purchasing activities, the pass-through entity is required to monitor the following, as applicable:
 - ▶ All requirements that were required if the pass-through entity performed the procurement and purchasing
 - ▶ Procurement and purchasing
 - ▶ Internal control procedures/segregation of duties
 - ▶ Accounting system
 - ▶ Record Retention
 - ▶ Suspension and debarment

Minimum Pass-Through Monitoring Standards - Cont.

- ▶ At a minimum, the OHS requires pass-through entities to monitor 20% of their subrecipients for each grant cycle with a minimum of 2 monitoring's required
- ▶ At least half of the required monitoring's must be conducted as on-site monitoring's
- ▶ Should select subrecipients with a higher risk indicated by risk assessment to be monitored
- ▶ If no high risk subrecipients, can choose which subrecipients to monitor



Minimum Pass-Through Monitoring Standards - Cont.

- ▶ Examples:
 - ▶ Pass-through entity has 12 subrecipients for the FY 2018 grant cycle
 - ▶ 20% of 12 subrecipients = 2.4; 2 monitoring's are required
 - ▶ 1 monitoring must be conducted on-site
 - ▶ Pass-through entity has 5 subrecipients for the FY 2018 grant cycle
 - ▶ 20% of 5 subrecipients = 1; 2 monitoring's are required
 - ▶ 1 monitoring must be conducted on-site
- ▶ Documentation of completed monitoring must be maintained in the grant file
- ▶ The OHS maintains desk and on-site monitoring form templates available for use

Common Areas of Non Compliance/Recommendations

- ▶ Subawards
 - ▶ Not completed
 - ▶ Completed incorrectly
 - ▶ Doesn't contain all required information
 - ▶ Not submitted to the OHS as required
- ▶ EHP
 - ▶ Not verifying if project requires EHP screening and clearance before project is started
- ▶ Procurement
 - ▶ Bid/quote requirements
 - ▶ Sole source purchasing requirements

Common Areas of Non Compliance/Recommendations- Cont.

- ▶ Advance Payment
 - ▶ Timeliness for providing proof of payment
- ▶ Contracts
 - ▶ Doesn't include required federal contract provisions
 - ▶ Contract not uploaded with claim in WebGrants
- ▶ Inventory
 - ▶ Missing information
 - ▶ Equipment items missing tags
 - ▶ Usage logs not containing all required information

Important Dates

Signed Awards - October 31, 2018

Required EHP's - January 15, 2019

Status Reports - January 10th and July 10th

Spending Plan - February 21, 2020

Regional Subaward Adjustments - May 31st, August 31st, November 30th, and February 28th

Final Scope of Work Change Subaward Adjustment - May 31, 2020

Period of Performance - September 1, 2018 - August 31, 2020

Final Claim and Final Status Report - October 15, 2020

Questions?

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