



FY 2019 Non-Profit Security Grant Program

Compliance Webinar

September 18 and 24, 2019

Subaward Agreements

- ▶ Subaward Agreements have been distributed
Original signed Subaward Agreement must be mailed to the OHS
Due October 31, 2019

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 Nonprofit Security Grant Program (NSGP) <https://dps.mo.gov/dir/programs/ohs/documents/fy18-nsgp-notice-of-funding-opportunity.pdf>
- ▶ Provides programmatic requirements specific to the Nonprofit Security Grant Program (NSGP)
- ▶ 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

National Cybersecurity Review (NCSR)

- ▶ All recipients of FY19 Homeland Security Grant funds are required to complete the NCSR
 - ▶ Due December 15th 2019
 - ▶ Failure to complete the review will result in loss of funding
 - ▶ Additional information will be provided in October



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 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/>



Single Feasible Source – Cont.

- ▶ Use of single feasible source procurement is discouraged. A single feasible source procurement exists when:
 - ▶ Non Federal Funds
 - ▶ Supplies are proprietary and only available from the manufacturer or a single distributor; or
 - ▶ Based on past procurement experience, it is determined that only one (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
 - ▶ Federal Funds and Other Non-Federal Funds Used for Federal Match
 - ▶ The item is available only from a single source; or
 - ▶ The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; or
 - ▶ The Office of Homeland Security expressly authorizes noncompetitive proposals in response to a written request from the local agency; or
 - ▶ After solicitation of a number of sources, competition is determined inadequate

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 - Keep Documentation Step Completed
 - ▶ 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)

If Prior Approval is not received it will not be paid.

No Retro Active Approvals!!

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/>

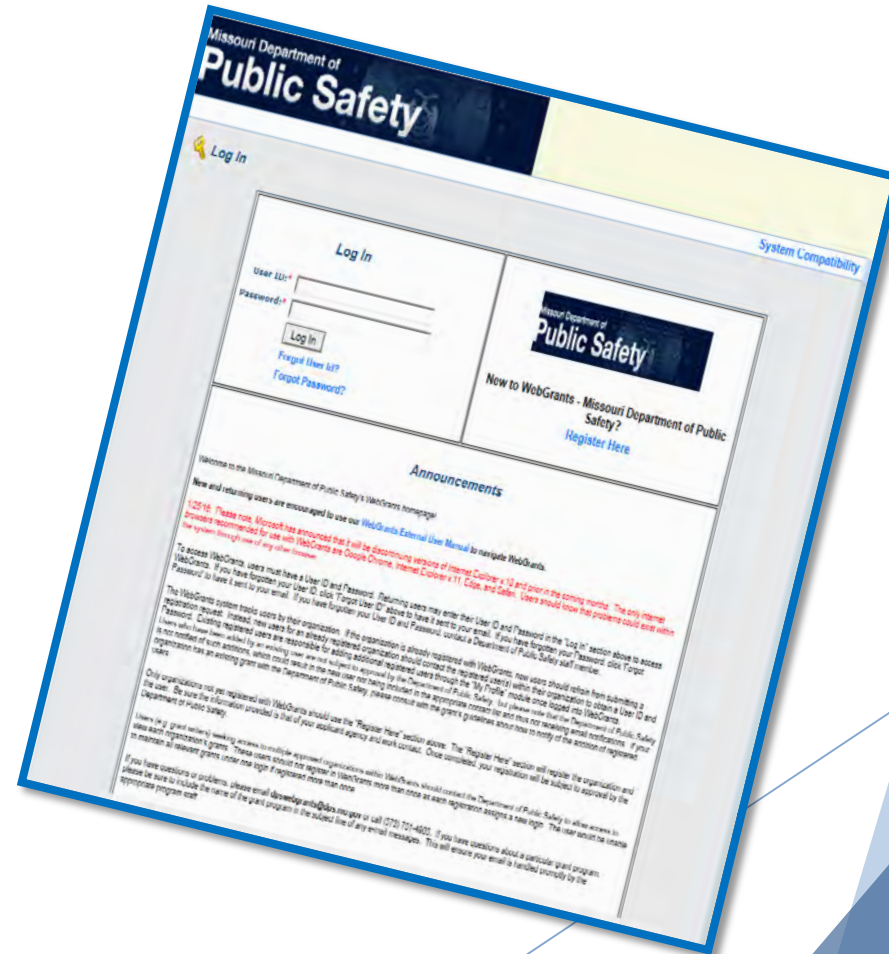
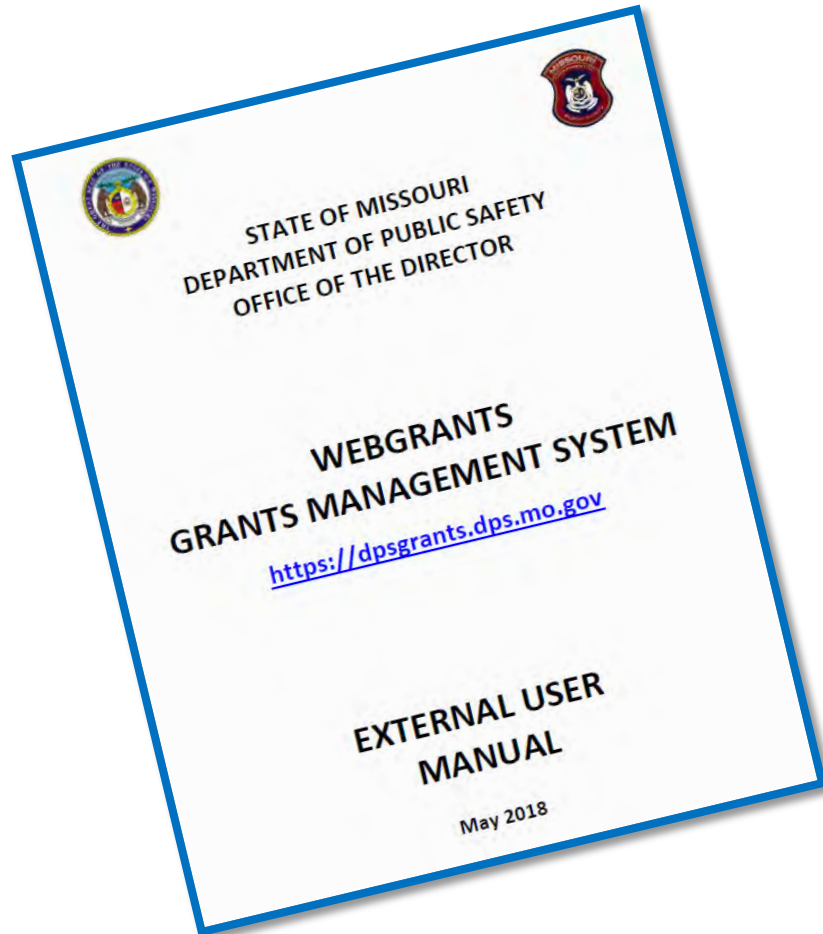
Project Management within WebGrants

- ▶ Budget will be set up by project within WebGrants
- ▶ Claims 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



WebGrants

<https://dpsgrants.dps.mo.gov>



Status Reports


- ▶ Status Reports must be completed through WebGrants
- ▶ Due Dates
 - ▶ January 10 (July 1 - December 31)
 - ▶ July 10 (January 1 - June 30)
- ▶ Final Status Reports must be completed before the award will be closed

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

- ▶ Approval to change scope from approved Investment Justification is extremely rare
- ▶ NSGP is a competitive award program. Expectation is all components included in original application will be completed
- ▶ Contact your Grant Specialist immediately if problem with scope of project



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.

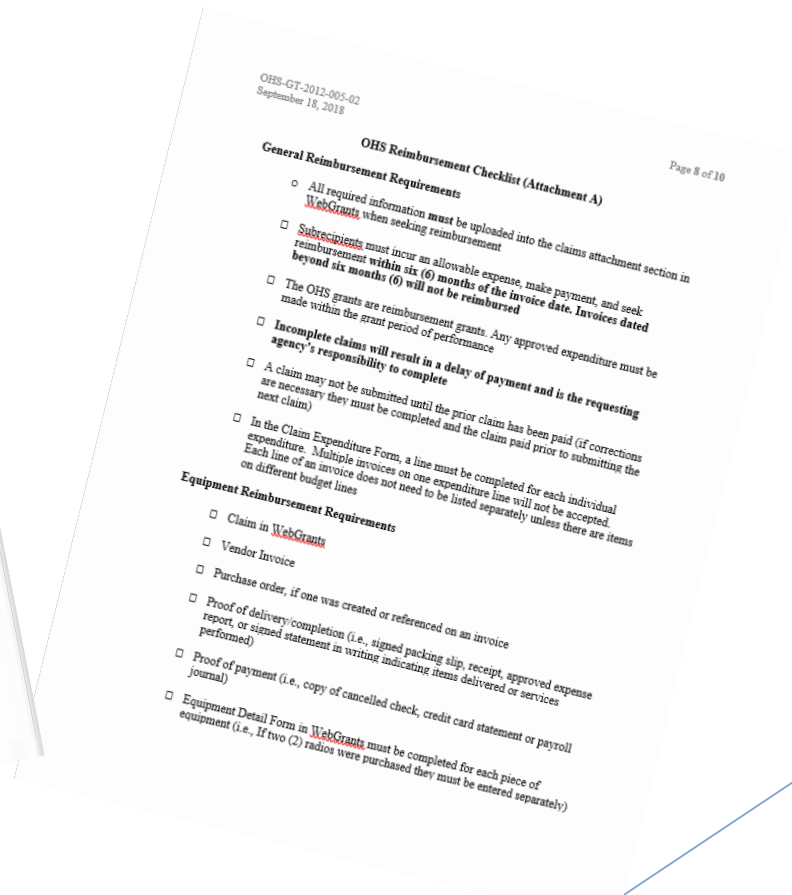
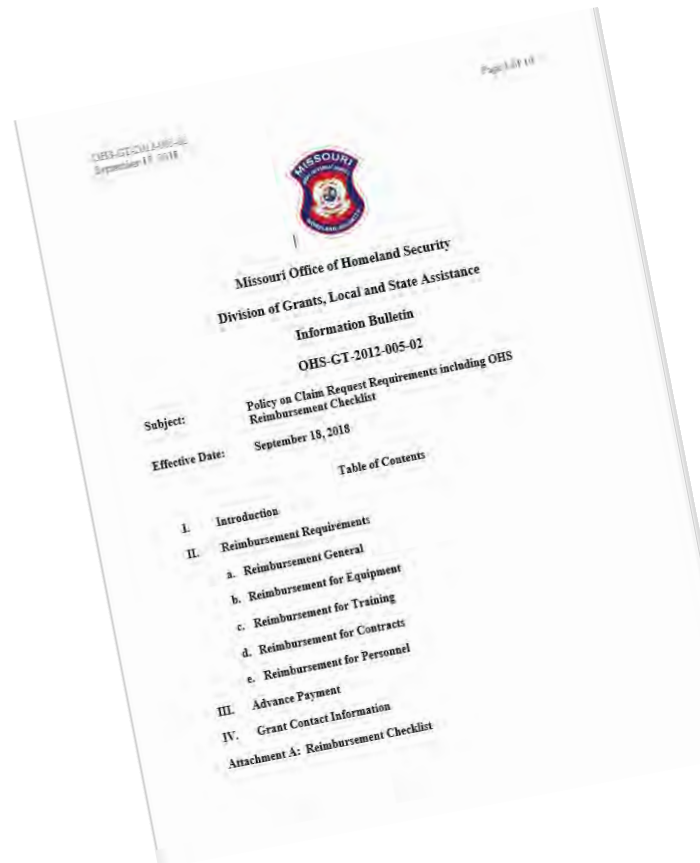
Claims – Cont.

▶ Equipment Reimbursement Requirements

- ▶ Claim in WebGrants
- ▶ Vendor Invoice
- ▶ Purchase order, if one was created or referenced on an invoice
- ▶ Proof of delivery/completion (i.e., signed packing slip, receipt, approved expense report, or signed statement in writing indicating items delivered or services performed)
- ▶ Proof of payment (i.e., copy of cancelled check, credit card statement or payroll journal)
- ▶ Equipment Detail Form in WebGrants must be completed for each piece of equipment (i.e., If two (2) radios were purchased they must be entered separately)

Claims - Cont.

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



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.

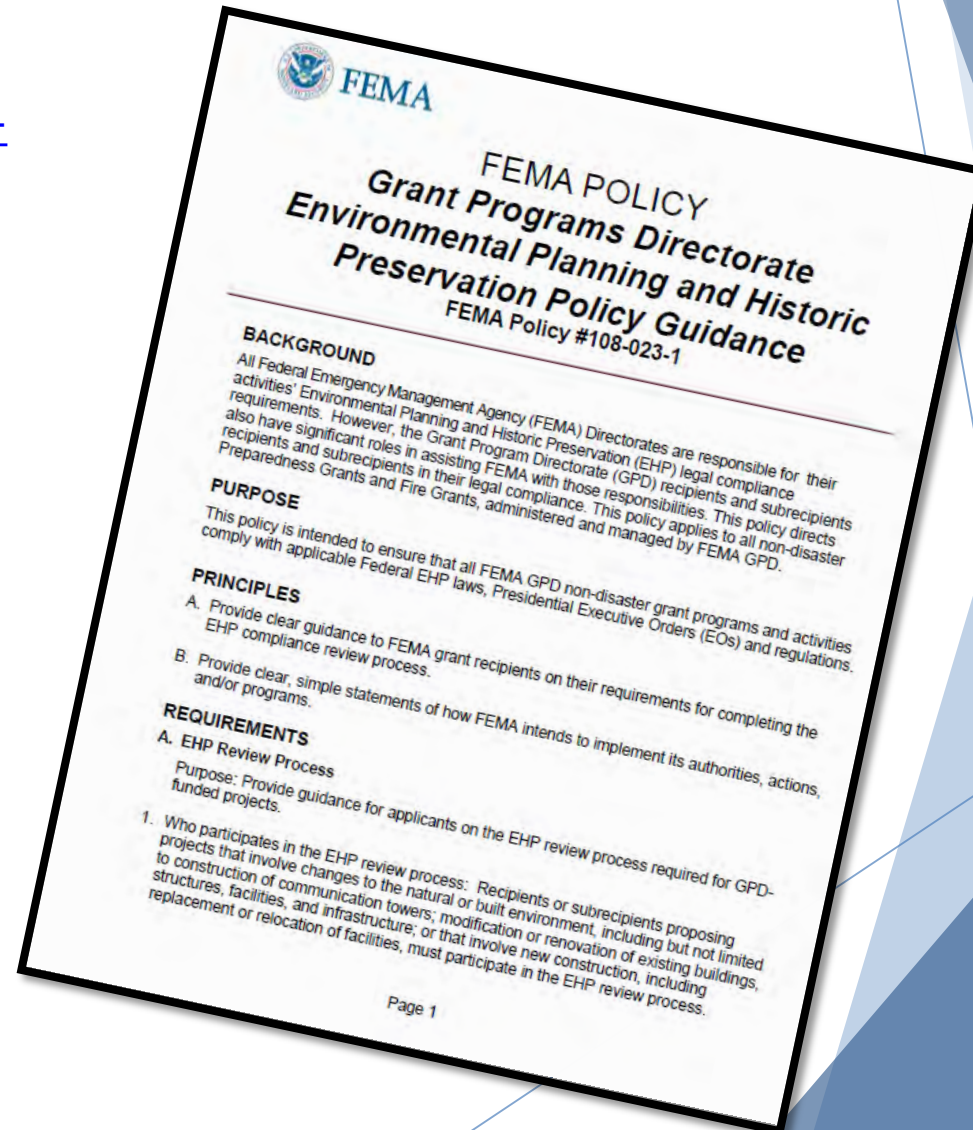
- ▶ The EHP review must be completed before initiating **ANY** work even if a previous award/year/program/project has an approved EHP review

No Retroactive Approvals



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:

https://dps.mo.gov/dir/programs/ohs/documents/ohs-grant-application-forms/environmental_historical_protection_screening_form.pdf

- ▶ 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

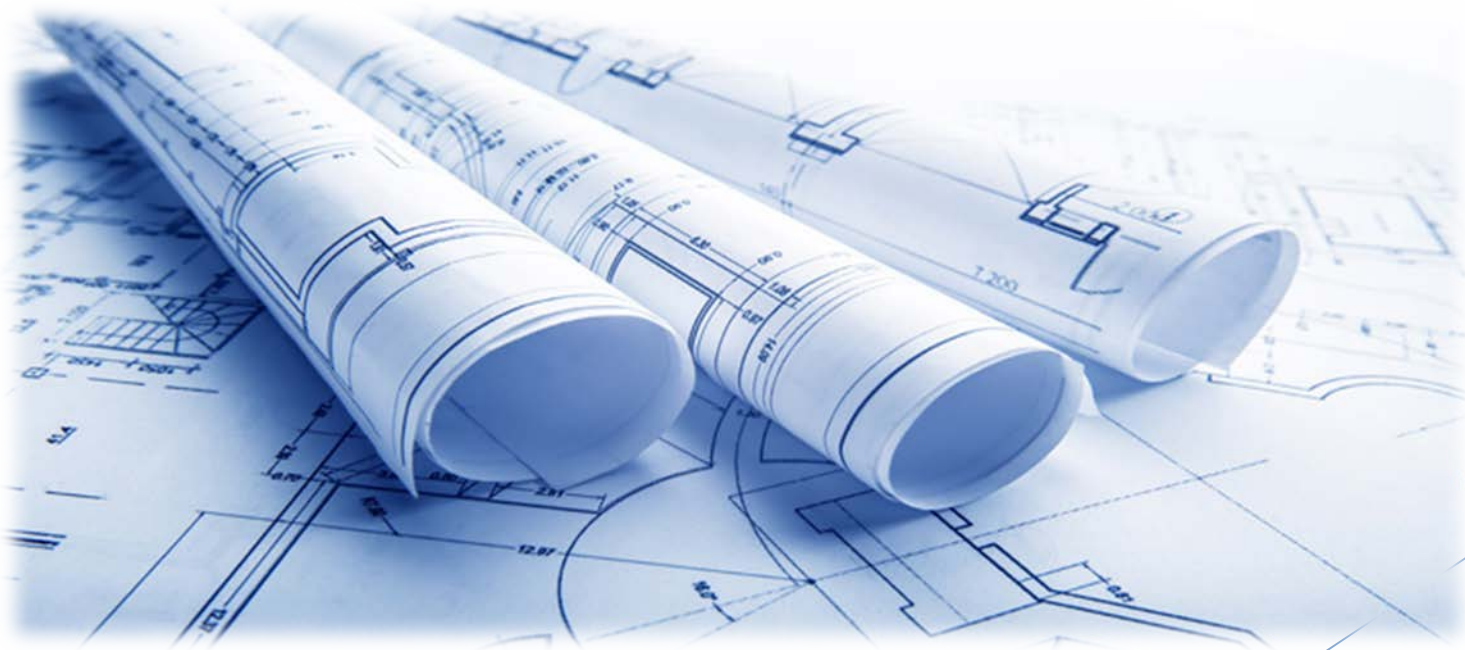
Required: site photographs, maps and drawings.

- ▶ 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.

Grant Monitoring

❑ Purpose of monitoring:

- ▶ Ascertaining compliance with all fiscal and programmatic responsibilities
 - ▶ Fiscal monitoring of planning, procurement and contracts, exercise, administrative, training funds, and compliance with regulations included in Articles of Agreement in the Grant Award of Contract
 - ▶ Programmatic monitoring of subrecipient progress towards achievement of goals and objectives, and operations, including equipment deployment, for project implementation and execution

❑ Site Monitoring Visit

- ▶ Will be scheduled and completed between May 2019 - October 2020

Reconciliation and Closeout

- ❑ Final Status Report must be submitted within 45 days after the end of the award performance period
 - ▶ Provide written notification and verification that all funds have been reimbursed

- ❑ Final office based review of the award
 - ▶ All outstanding monitoring corrections must be completed before closing out the grant



Record Retention

- ❑ Must maintain grant files for a period of 5 years from the end of the state fiscal year in which the grant program closes. These files include all funded applications, supporting documentation, contracts, agreements, and routine reports submitted by the grant recipient
- ❑ Project completion has not occurred until all reporting requirements are satisfied and final payments have been made
- ❑ Retention period for equipment records starts from the date of the equipment disposition

Key Dates - Next Six Months

Signed Awards - October 31, 2019

Register WebGrants - November 30, 2019

Detailed Project Description & Quarterly Meeting Time Selected - November 30, 2019

SAM II Vendor Input Form - December 31, 2019

Submit Procurement Policy or Formal Adoption of State of Missouri's - December 31, 2019

Status Reports - January 10th and July 10th

Completed EHP Submitted to OHS - March 15, 2020

Period of Performance - September 1, 2019 - August 31, 2021

OHS Contacts

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Questions?