



FY 2019 Urban Area Security Initiative
Grant Award and Compliance Workshop
September 18, 2019

Agenda

- ▶ Welcome
- ▶ Grant Compliance
- ▶ Environmental Historical Preservation
- ▶ Inventory Compliance Training
- ▶ WebGrants
- ▶ New WebGrants Procedures
- ▶ Pass-Through Requirements
- ▶ Monitoring
- ▶ Handout Awards



Grant Requirements

Michelle Branson, Grants Specialist

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

- ▶ The Administrative Guide for Homeland Security Grants
<https://dps.mo.gov/dir/programs/ohs/grantstraining/>
- ▶ 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 2019 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, 2019
- ▶ 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.**
(Regionalization awards will be available under the Management and Administration Project)

Subaward Documents - Final

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**
 - ▶ Maintain documentation showing this was verified (email, memo or copy of EOP)
- ▶ 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



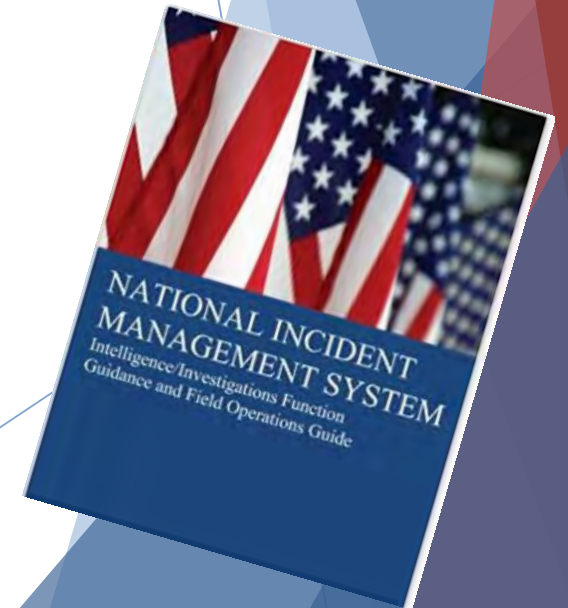
National Cybersecurity Review (NCSR)

- ▶ 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



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>
- ▶ Regional Planning Commission (RPC)/Council of Governments (COG)
 - ▶ Executive Director and Project Director are required to complete IS 700 within 12 months of hire/appointment date, and send a copy of the Completion Certificate to your OHS Grant Specialist



Procurement Requirements

- ▶ With any expenditure, the subrecipient must 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/>



- ▶ If purchase is made using a single feasible source without prior approval, OHS has the right to refuse reimbursement
 - ▶ Non compliance could result in the agency being listed as high risk

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
 - ▶ 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>
 - ▶ *Maintain a copy of a screenshot in the grant file to verify this was completed*



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 IB's, examples of some of these items:**
 - ▶ 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/>
 - ▶ Expended funds include all Federal funds, not just Homeland Security funds

FY 2019 Threat Hazard Identification and Risk Analysis (THIRA)

UASI

- ▶ THIRA update due tri-annually
- ▶ SPR is due annually

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.

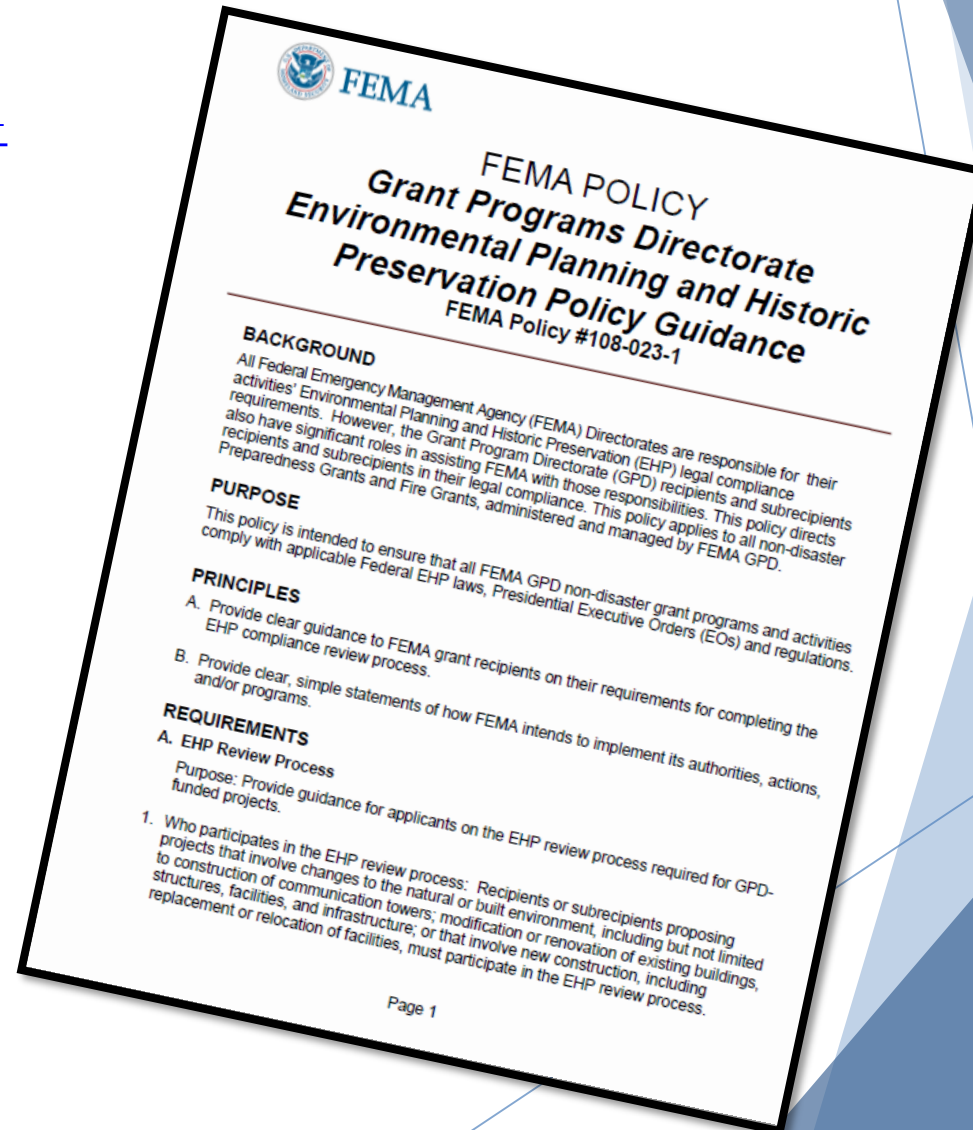
- ▶ The EHP review must be completed before initiating ANY work even if a previous award/year/program/project has an approved EHP review.

NO RETROACTIVE APPROVALS



Policy Guidance August 15, 2018

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



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 the responsibility of and paid by the grant subrecipient.



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 (Interior and exterior)
- ▶ 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.



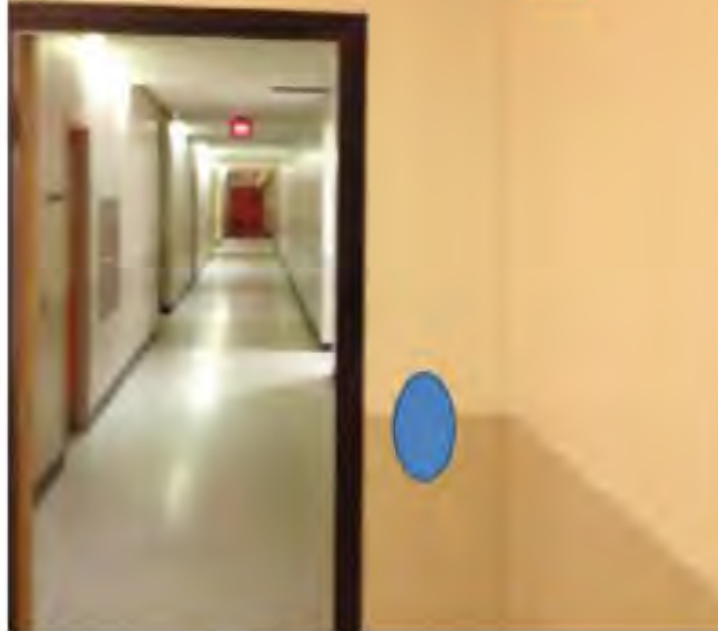
Figure 2. Example of ground-level photograph showing proposed attachment of new equipment

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 must 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: Michelle.Branson@dps.mo.gov.
- ▶ Questions: Michelle Branson, (573) 526-9014

WebGrants

- ▶ Subaward Adjustments
- ▶ Updated processes/procedures
 - ▶ Claims
 - ▶ Correspondence
 - ▶ Approval Requests

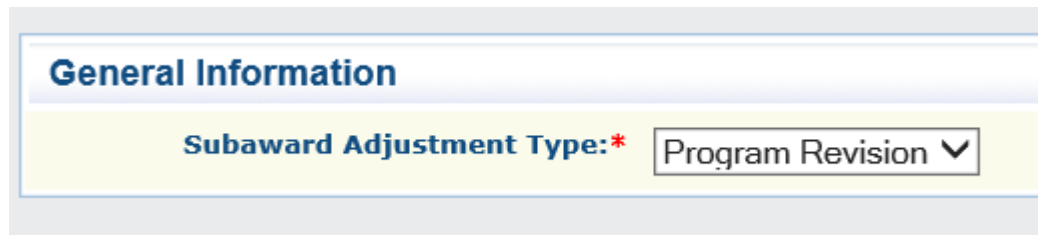
Subaward Adjustments

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



Subaward Adjustment - Cont.

- ▶ Program Revision Subaward Adjustments include but not limited to
 - ▶ Project updates (change in training from one to another)
 - ▶ Changes in Key Personnel (Project Director, Authorized Official, Executive Director, New Fiscal Staff)



The image shows a screenshot of a web form. At the top, there is a section header 'General Information' in bold blue text. Below this, there is a yellow highlighted area containing the text 'Subaward Adjustment Type: *' in bold blue text, followed by a dropdown menu. The dropdown menu is currently set to 'Program Revision' with a downward arrow icon.

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	

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
- ▶ Spending plan will be submitted thru the Correspondence Component in Webgrants



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
- ▶ ***Supporting Documentation must be in one attachment in the same order as the Expenditure form***
- ▶ **Incomplete claims will result in a delay of payment.** It is the requesting agency's responsibility to complete the necessary changes
- ▶ Reimbursements require copies of cancelled checks



Claims - Cont.

- ▶ **Claims going “less paper”**
- ▶ Updated claim attachment procedure
 - ▶ All supporting documentation must be in one attachment
 - ▶ Attached documentation must be in the same that is displayed on the Expenditure Form
 - ▶ Documentation items should be in the order listed on the OHS Reimbursement Checklist

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

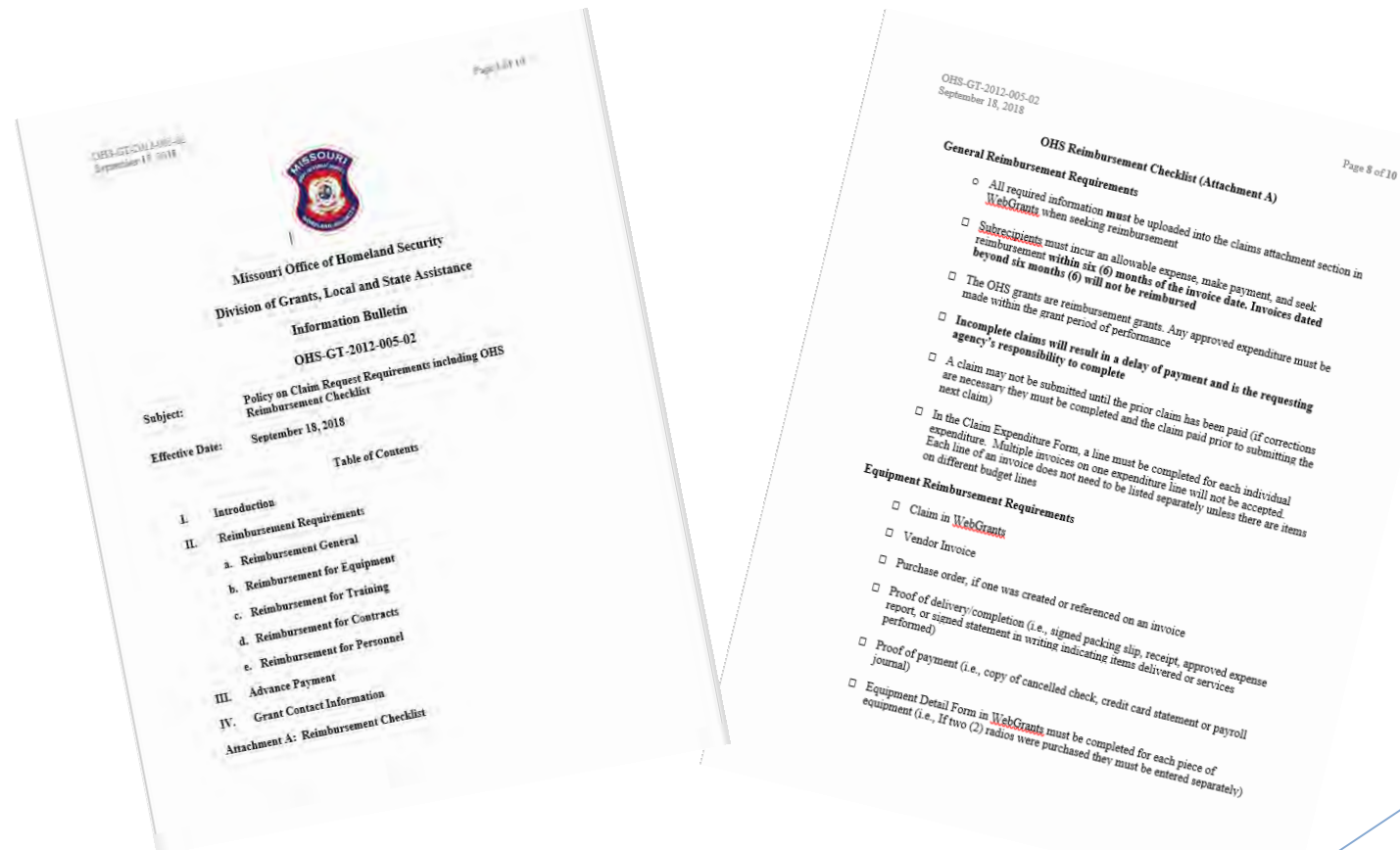
Expenditures										
Create New Version Mark as Complete Go to Claim Forms Add										
Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
10001	ACME Inc.	SCBA Tanks	10.0	\$1,000.00	\$10,000.00	\$10,000.00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

► Correct

Expenditures										
Create New Version 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	6.0	\$1,000.00	\$6,000.00	\$6,000.00	456	7/3/18	130	7/5/18
10001	Acme Inc.	SCBA Tanks	4.0	\$1,000.00	\$4,000.00	\$4,000.00	123	6/1/2018	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



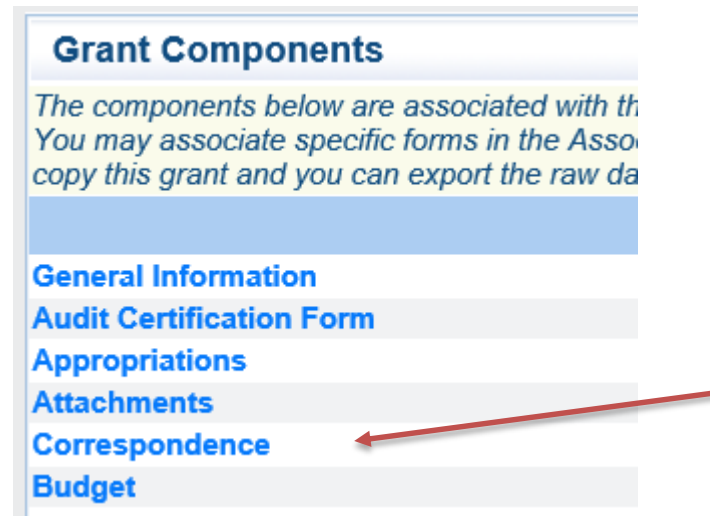
New WebGrants Procedures

- ▶ **OHS is going “less paper”**

- ▶ Correspondence Component will be used for requesting and providing approval for the following items
 - ▶ Training Requests
 - ▶ Single Feasible Source (SFS) Requests
 - ▶ Equipment Approvals (i.e. Generators)
 - ▶ **EHP's**
 - ▶ Contract Reviews
 - ▶ Spending Plan

Correspondence Component

- ▶ All approval requests must be submitted through the Correspondence Component in WebGrants
 - ▶ Approval for requests will be sent through this component



Correspondence Component - Cont.

- Create a new Correspondence

Inter-System Grantee Correspondence					Add
Subject	From	To	Sent/Received	Attachments	

Correspondence Send

To:*

Michelle Branson
Devyn Campbell
Cindy Hultz

CC:

Test@test.com

CC addresses must be entered in a valid email format. Use a semicolon (;) to separate multiple CC email addresses.

Subject:*

WebGrants Correspondence x

Message:

Attachments:

Browse...


Browse...

Browse...

Correspondence Component - Cont.


- ▶ Replying to an email
 - ▶ Select the subject of the email in Blue

Inter-System Grantee Correspondence
Subject
Grant EMW-2017-SS-00047-03 - Region B - 2017 Regionalization: FY 2018 Application Scores



- ▶ In the open correspondence select Reply

Correspondence	Reply
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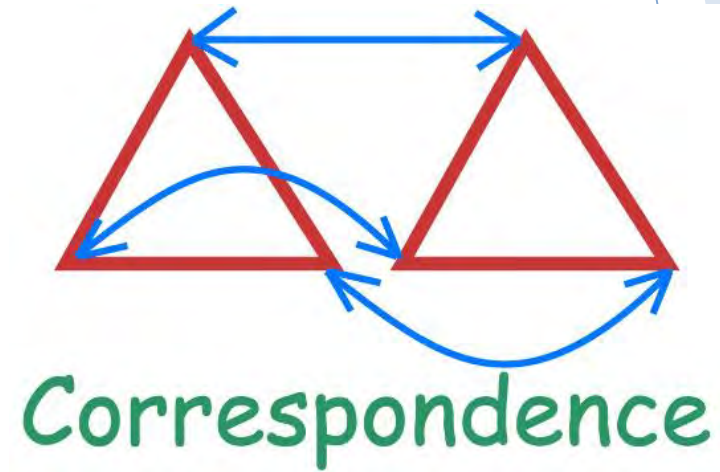
Correspondence Component - Cont.

- ▶ Your Grant Specialist will receive an email alert when you send correspondence through WebGrants
- ▶ When you receive correspondence, it will be sent to your email from dpswebgrants@dpsgrants.dps.mo.gov
- ▶ Use WebGrants to reply to Correspondence
 - ▶ *** DO NOT REPLY TO CORRESPONDENCE FROM YOUR EMAIL ***
 - ▶ If you reply from your email it goes to a generic email box instead of to your Grant Specialist, this will cause a delay in response



Correspondence Approval

- ▶ Training Requests (updated form)
- ▶ Contract Reviews
- ▶ Single Feasible Source Requests (Updated form)
- ▶ Special Condition Approvals
- ▶ **Equipment Approvals (Generators, EHP's)**
 - ▶ Updated forms are available on our website
<https://dps.mo.gov/dir/programs/ohs/grantstraining/>





Pass-Through Entities and Monitoring

Michelle Branson, Grants Specialist

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



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

- ▶ The OHS maintains a Grant Adjustment Notice (GAN) template that can be utilized for 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

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.

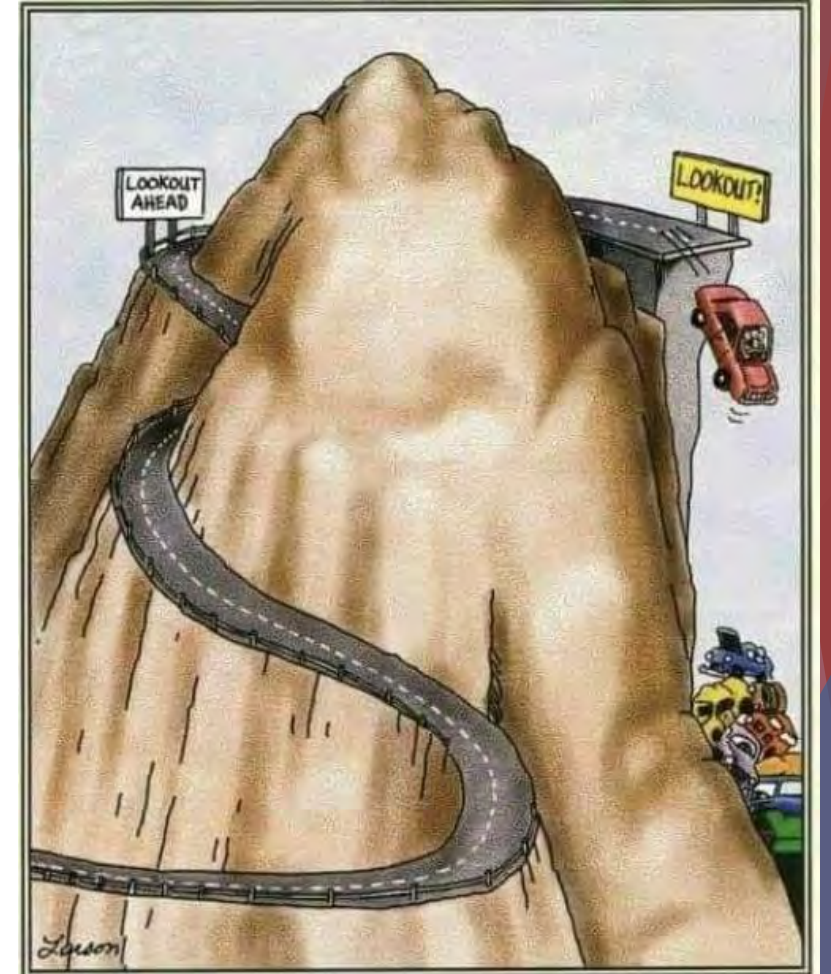
- ▶ Must be completed by pass-through entities for each subrecipient before a subaward is issued
- ▶ Evaluation of risk may include factors such as:
 - ▶ Prior experience
 - ▶ Previous audit conclusions
 - ▶ New personnel or new/changed time/accounting systems
 - ▶ Federal monitoring conclusions
 - ▶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

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 10% of their subrecipients (projects) for each grant cycle
- ▶ 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 20 subrecipients for the FY 2019 grant cycle
 - ▶ 10% of 20 subrecipients = 2 monitorings
 - ▶ 1 monitoring must be conducted on-site
 - ▶ Pass-through entity has 5 subrecipients for the FY 2018 grant cycle
 - ▶ 10% of 5 subrecipients = 1
 - ▶ Since only 1 monitoring is required it 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 (30 days)
- ▶ 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 Award Due - October 31, 2019

Spending Plan - February 21, 2022

Final Scope of Work Change Subaward Adjustment - May 31, 2022

Period of Performance - September 1, 2019 - August 31, 2022

Final Claim - October 15, 2022

Questions?

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