



FY 2019 Next Generation 911

Grant Award and Compliance Workshop

July 6, 2020

Agenda

- ▶ Welcome
- ▶ Grant Compliance
- ▶ Inventory Compliance Training
- ▶ WebGrants



Grant Requirements

Michelle Branson, Grants Supervisor

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-2012-003 - 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
 - ▶ OHS-GT-2018-008 - Policy on Budget Modifications, Scope of Work Changes, and Spending Plans
 - ▶ OHS-GT-2020-101 - Policy on Next Generation 911 Grant Program (NG911) Claim Request Requirements Including OHS Reimbursement Checklist

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
- ▶ 47 CFR Part 400, 911 Grant Program
- ▶ 911 Grant Program Notice of Funding Opportunity available at: <https://www.grants.gov/web/grants/search-grants.html?keywords=911%20grant%20program>
- ▶ 2 CFR Part 1201, Department of Transportation, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- ▶ 2 CFR Part 1327, Department of Commerce, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Federal Grant Requirements, Cont.

- ▶ 2 CFR Part 25, Financial Assistance Use of Universal Identifier and System for Award Management
- ▶ Whistleblower protections, including 10 U.S.C 2409, 41 U.S.C. 4712, and 10 U.S.C. 232, 41 U.S.C. 4304 and 4310
- ▶ Executive Order 13043, Increasing Seat Belt Use in the United States
- ▶ Executive Order 13513, Federal Leadership on Reducing Text Messaging While Driving

Subaward Agreements

- ▶ Subaward Agreements will be distributed via email after an agency has completed the training
 - ▶ **Original, signed, Subaward Agreement must be mailed to the OHS by July 31, 2020**
- ▶ 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.

Subaward Documents - Final

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>

Procurement Standards

At a minimum, the subrecipient must meet the following procurement standards:

- ▶ All procurement transactions whether negotiated or competitively bid shall be conducted in a manner so as to provide maximum open and free competition
- ▶ Contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements
- ▶ All quotations and rationale behind the selection of a source of supply shall be retained, attached to the purchase order copy, and placed in the accounting files.
- ▶ Items costing less than \$10,000 may be purchased with prudence on the open market
- ▶ All purchases estimated to total between \$10,000 but less than \$100,000.00 to a single vendor, must be competitively bid, but need not be solicited by mail or advertisement. An informal method is acceptable, for example: request for quotation, telephone quotes, online pricing, etc.
- ▶ All purchases with an estimated total expenditure of \$100,000.00 or over to a single vendor shall:
 - ▶ be advertised for bid in at least two daily newspapers for general circulation in such places as are most likely to reach prospective bidders (and may advertise in at least two (2) weekly minority newspapers and may provide such information through an electronic medium available to the general public) at least five (5) consecutive days before bids for such purchases are to be opened
 - ▶ post a notice of the proposed purchase in a public area of the subrecipient's office
 - ▶ solicit bids by mail or other reasonable methods generally available to the public from prospective suppliers
 - ▶ If less than (3) bids are received OHS must approve prior to vendor selection

Single Feasible Source

- ▶ Use of a single feasible source procurement of \$10,000 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*



Audit Requirements

- ▶ State and local units of government, 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



Inventory

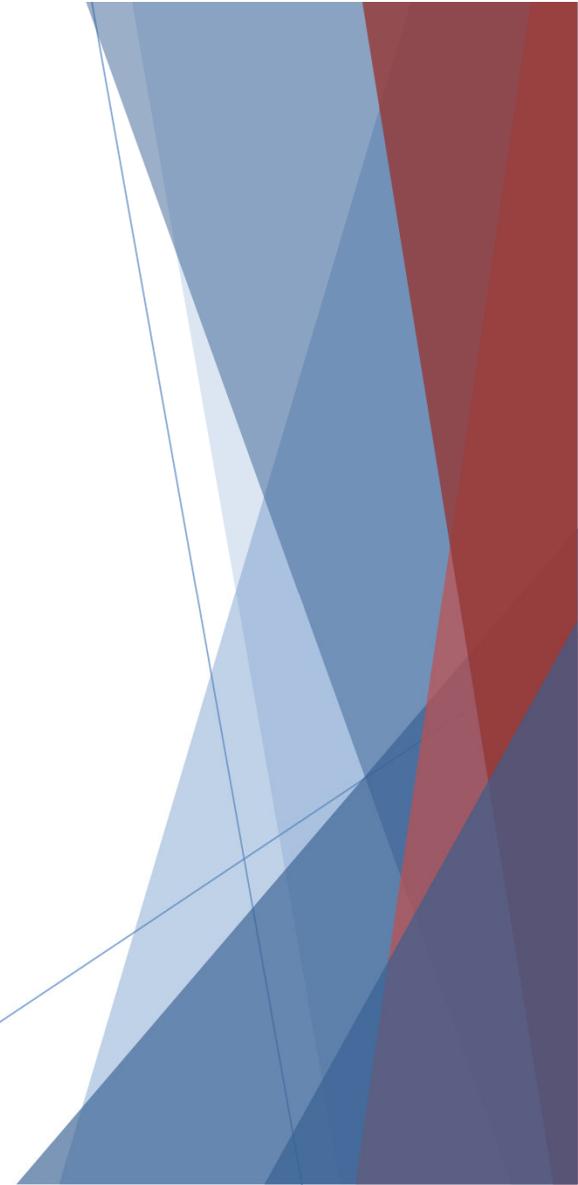
Equipment

- ▶ 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 Use - Cont.

- ✓ Equipment must be used in the program or project it was acquired for as long as needed
- ✓ When no longer needed, the equipment may be used in other activities supported by the Federal awarding agency, in the following priority:
 - Activities from the Federal awarding agency, which funded the original project
 - Activities under Federal awards from other Federal awarding agencies
- ✓ When acquiring replacement equipment, the non-Federal entity may use the equipment to be replaced as a trade in or sell the property and use the proceeds to offset the cost of the replacement property

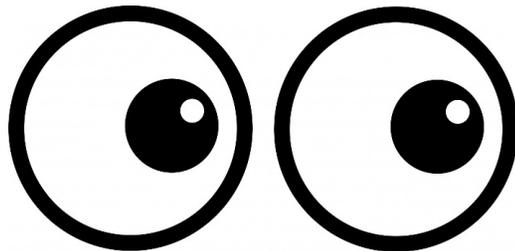
Inventory Management



Inventory Management

✓ Subrecipients **MUST:**

- Have an inventory management system and maintain effective control
- Have a control system in place to prevent loss, damage and theft
- Investigate all incidents
- Have adequate maintenance procedures to keep property in good condition



Inventory Management 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 of the incident

Inventory Management - Cont.

- ✓ Equipment property records **MUST** be one item per line and include the following:
 - Region
 - County
 - Fiscal Year
 - Grant Program
 - Grant Award Number
 - Description of Equipment
 - WebGrants Line Item Number
 - Manufacturer
 - Model
 - Identification number
 - Title holder
 - Quantity
 - Individual Item Cost
 - % of Federal Participation in the Cost
 - Date of Delivery
 - Physical Location (**MUST** be the physical address)
 - Readiness Condition (Mission Capable/Not Mission Capable)
 - Final Disposition
 - Date of Final Disposition
 - Final Disposition Sale Price
 - Contact Name
 - Contact Email
 - Contact Phone Number

Inventory Form Examples

Correct:

Region	County	Fiscal Year	Grant Program	Grant Award Number	Description of Equipment	EGMS/WebGrants Line Item Number	Manufacturer	Model	Identification Number	Title Holder	Quantity	Individual Item Cost	Total Cost	% of Federal Participation in the Cost	Date of Delivery	Physical Location	Use	Readiness Condition	Final Disposition	Date of Final Disposition	Final Disposition Sale Price	Contact Name	Contact Email	Contact Phone Number
C	Ste. Genevieve County	2018	SHSP	EMW-2018-SS-00044-04-07-001	Generator installed in portable trailer	10001	Honda	EU7000IS	86102-00473	Ste. Genevieve County Sheriff's Department	1	\$11,306.60	\$ 11,306.60	100.00%	5/25/2019	5 Basler Drive Ste. Genevieve, MO 63670	Regional	Mission Capable				Jason Schott	jschott@gcso.com	(573) 883-5820

Inventory Management - Cont.

- ✓ New inventory will be added to OHS inventory at the time claims are approved
- ✓ Physical Inventory **MUST** be taken and results reconciled once every two years

Next inventory will be sent out in April 2022 and due to OHS October 1, 2022



Equipment Disposition



Equipment Disposition

- ✓ When original or replacement equipment acquired with grant 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 federally sponsored project or program
- ✓ Disposition requests should be submitted on a timely basis. Disposition requests should **not** be held and submitted for approval at the time of the bi-annual physical inventory

Equipment Disposition - Cont.

- ✓ 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 equipment disposition approval. Email the Equipment Disposition Forms to Maggie Glick at Maggie.Glick@dps.mo.gov
- ✓ A 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/>



Equipment Disposition - Cont.

- ✓ Equipment with a per item fair market value of **less than \$5,000** may be retained, sold, or disposed with no further obligation when approval is given by OHS
- ✓ Equipment with a per item fair market value of **\$5,000 or more** may be retained or sold



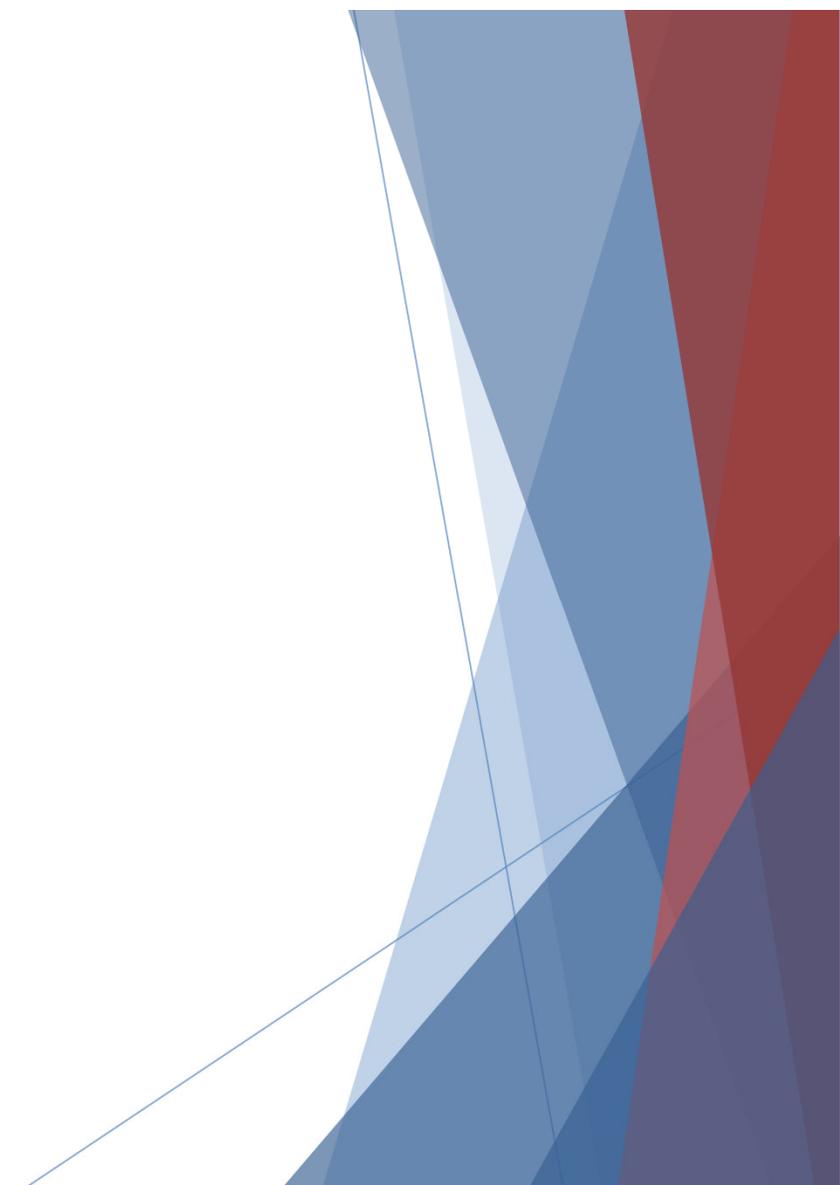
Equipment Disposition - Cont.

- ✓ If sold, the Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from the sale by the Federal awarding agency's percentage of participation

Example: Region X wants to sell their 2009 F150, which was 60% funded with federal grant funds and 40% funded with local funds. The fair market value for their 2009 F150 was \$6,000.00. The Federal awarding agency would be entitled to \$3,600.00 of the proceeds and the local agency would be entitled to \$2,400.00

WebGrants

- ▶ Status Reports
- ▶ Subaward Adjustments
- ▶ Claims
- ▶ Correspondence



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 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

Final Status Report

- ▶ A final Status Report must be completed to close out a project
 - ▶ They do not say Final in the system
 - ▶ All milestones need to be marked as final
- ▶ Narrative Project Process should state the project is complete and describe how this project has fulfilled the investment justification and identify other initiatives which have been impacted by this project (Summary or project accomplishments, and impact on capability)

Final Status Report - Cont.

Milestone Progress					Create New Version Mark as Complete Go to Status Report Forms Add
Milestone:	Project Name:	Estimated Completion Date:	% Milestone Completed	Milestone Progress:	
Example Milestone 1	Example	08/31/2019	100%	Complete	
Example Milestone #2	Example	08/31/2019	100%	Complete	

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?	
Example 1	Final Report - This project has been completed. Equipment (generator, vehicle, etc.) has been received is in working order and is being used for the purpose of the project.	

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
 - ▶ Changes in Key Personnel (Project Director, Authorized Official, Executive Director, New Fiscal Staff)

General Information	
Subaward Adjustment Type:*	Program Revision ▼

Subaward Adjustment - Cont.

- ▶ Subaward Adjustments are required for:
 - ▶ Budget modifications
 - ▶ Scope of Work Changes
 - ▶ 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

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 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
- ▶ All items must be received installed and invoices paid prior to submission of a claim
- ▶ Claims must be submitted through WebGrants to request reimbursement
- ▶ Supporting documentation must be submitted with each claim
 - ▶ IB OHS-GT-2020-010 - Policy on Next Generation 911 Grant Program (NG911) 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 require proof of payment (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
- ▶ Match must be met at 40% local funds/60% federal funds for payments to be made (cannot claim federal funds prior to match funds being expended)

Claims - Cont.

► Expenditure form

Expenditures

Line Number: 1001 - Equipment - Test ▼

Payee*: Test

Description*: Test

Quantity*: 1.0

Unit Cost*: \$500.00

Federal Amount Requested: \$300.00

Invoice #: 1

Invoice Date*: 1

Check/EFT*: 1

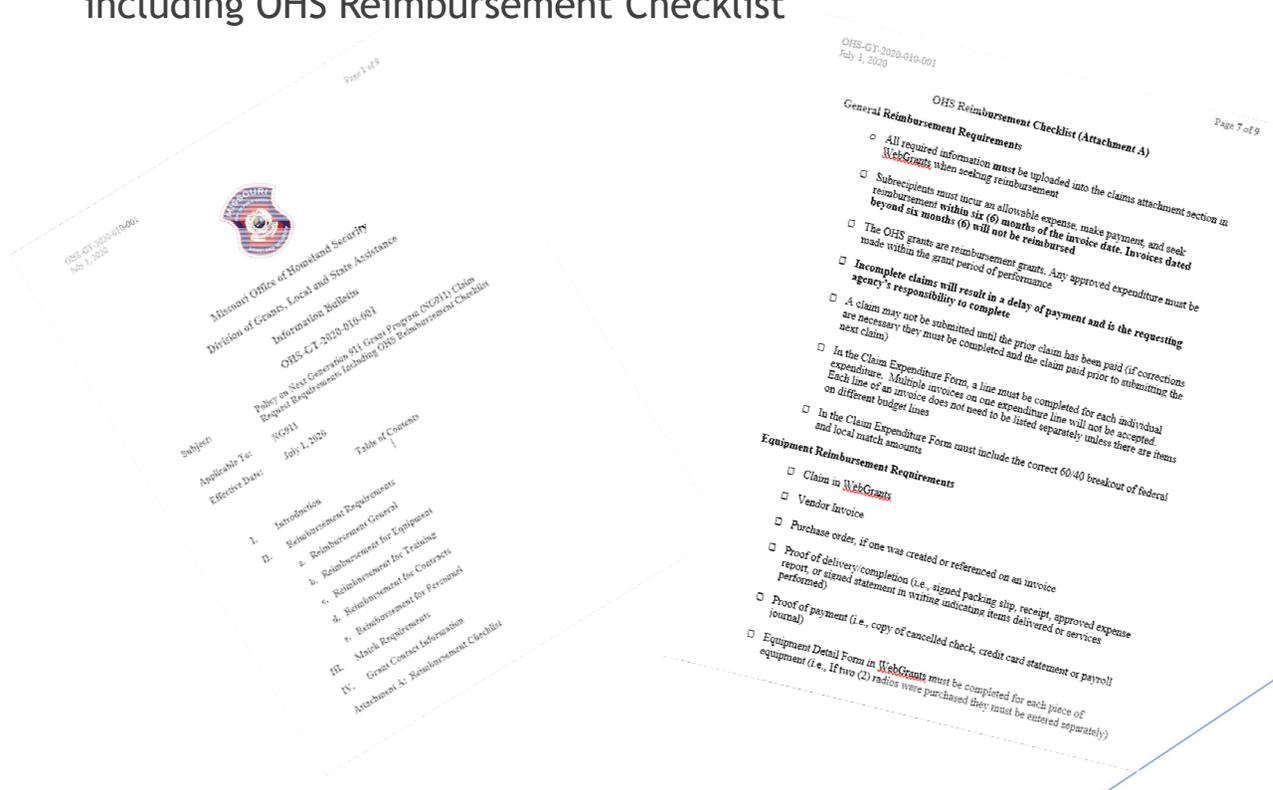
Check/EFT Date*: 1

Expenditures

Line Number	Payee	Description	Quantity	Unit Cost	Total	Expense Federal Total	Federal Amount Requested	Match Amount Claimed	Invoice #	Invoice Date	Check/EFT	Check/EFT Date
1001	Test	Test	1.0	\$500.00	\$500.00	\$300.00	\$300.00	\$200.00	1	1	1	1
2001	Test	Test	1.0	\$100.00	\$100.00	\$40.00	\$40.00	\$60.00	1	1	1	1
							\$340.00					

Claims - Cont.

- ▶ Required documentation can be found in IB OHS-GT-2020-010 - Policy on Next Generation 911 Grant Program (NG911) Claim Request Requirements including OHS Reimbursement Checklist



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

The screenshot displays the 'Inter-System Grantee Correspondence' form. At the top, there is a header bar with the title 'Inter-System Grantee Correspondence' and an 'Add' button on the right. Below this is a table with columns: 'Subject', 'From', 'To', 'Sent/Received', and 'Attachments'. The main form area is titled 'Correspondence' and contains several fields: 'To:*' with a dropdown menu showing 'Michelle Branson', 'Devyn Campbell', and 'Cindy Hultz'; 'CC:' with a text input field containing 'Test@test.com' and a note below it stating 'CC addresses must be entered in a valid email format. Use a semicolon (;) to separate multiple CC email addresses.'; 'Subject:*' with a text input field containing 'WebGrants Correspondence' and a close button 'x'; 'Message:' with a large text area; and 'Attachments:' with three 'Browse...' buttons. A 'Send' button is located at the top right of the form area. Red arrows point to the 'Add' button, the 'To:*' dropdown, the 'CC:' field, the 'Message:' text area, and the 'Send' button.

Correspondence Component - Cont.

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



- ▶ In the open correspondence select Reply



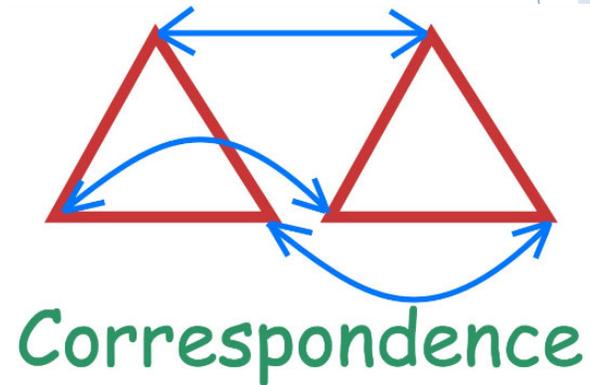
Correspondence Component - Cont.

- ▶ 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 USE REPLY TO CORRESPONDENCE FROM YOUR PERSONAL/WORK 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 Requests

- ▶ Contract Reviews
- ▶ Single Feasible Source Requests
- ▶ Special Condition Approvals
- ▶ Updated forms are available on our website
<https://dps.mo.gov/dir/programs/ohs/grantstraining/>





Monitoring

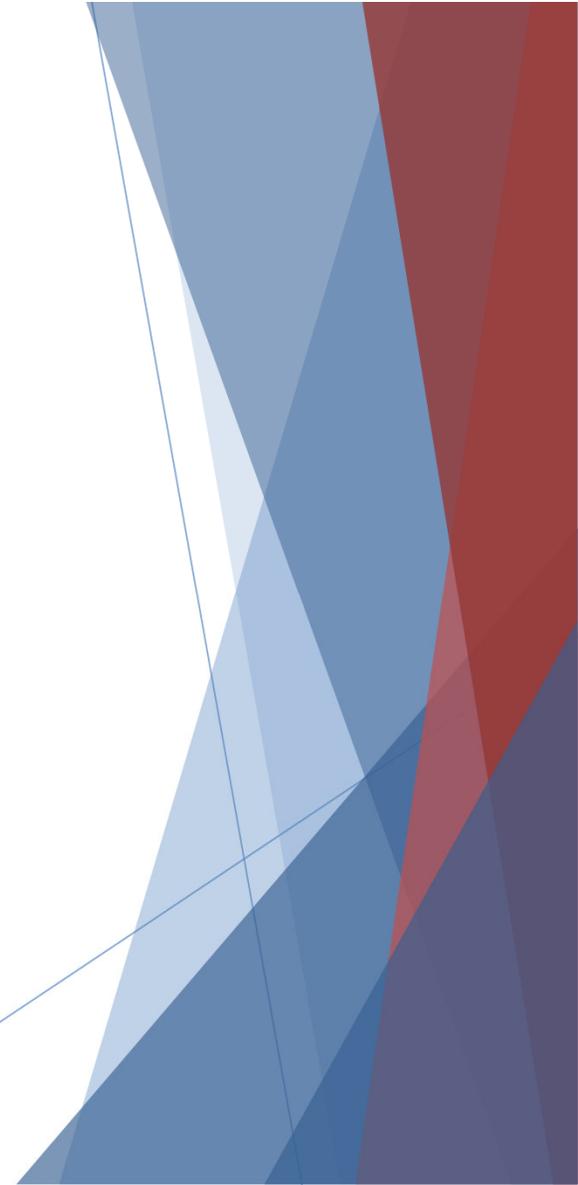
Risk Assessments

- ▶ 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



Risk Assessments - Cont.

- ▶ 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

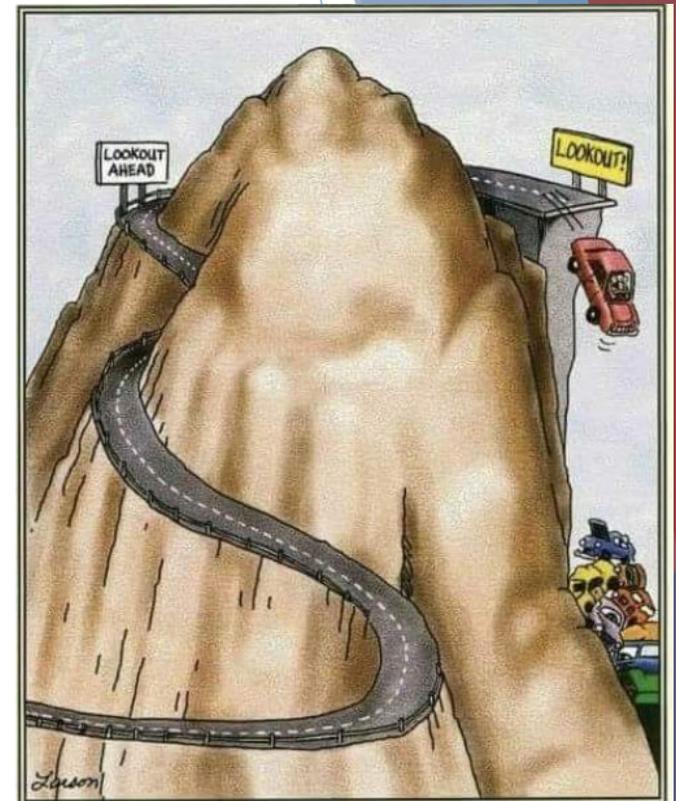


Risk Assessment Results

- ▶ 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 Agreement, 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 statues, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.”

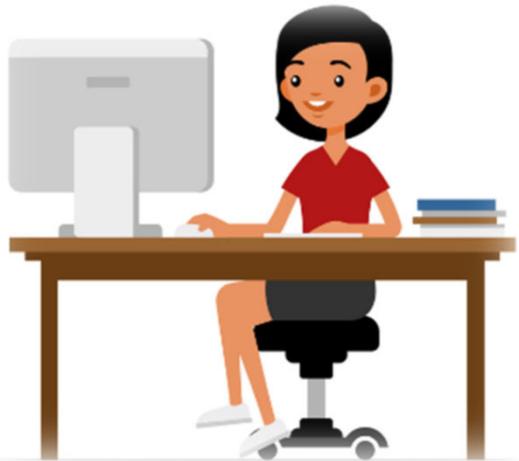
What Documents Guide Monitoring

- ▶ 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- ▶ NTSA Federal NG911 Grant Program Notice of Funding Opportunity
- ▶ 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



Important Dates

Signed Awards Due - July 31, 2020

Status Reports - January 10th and July 10th

Final Scope of Work Change Subaward Adjustment - October 1, 2021

Period of Performance - July 1, 2020 - December 31, 2021

Final Claim and Final Status Report - February 15, 2022

OHS Contacts

Joni McCarter

Program Manager

(573) 526-9020

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Maggie Glick

Administrative Office Support Assistant

(573) 522-6125

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Michelle Branson

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Chelsey Call

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Questions?

