

Agenda

- ▶ Grant Requirements
- ► Environmental Historic Preservation (EHP)
- ► Inventory Management
- WebGrants
 - Subaward Agreement
 - ▶ Budget
 - ► Reimbursement Request (Claims)
 - Subaward Adjustment
 - ▶ Status Report
 - ▶ Correspondence
- ▶ Grant File
- ► Grant Closeout
- Monitoring

Federal Grant Requirements

- Code of Federal Regulations 2 CFR Part 200 the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
 - ▶ 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 2022 Nonprofit Security Grant Program (NSGP)
 - ▶ Provides programmatic requirements specific to the Nonprofit Security Grant Program (NSGP)
- ► Grant Programs Directorate (GPD) Information Bulletins (IBs)
 - The IBs provide administrative instructions and guidelines critical to supporting the effectiveness and efficient delivery of the grant

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)

- 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
- ► The Administrative Guide for Homeland Security Grants and IBs are located on the Department of Public Safety (DPS) Grants Section website

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

Procurement 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
 - ► Submit statement indicating their agency is utilizing the State of Missouri Procurement Policy for this project
 - ▶ State of Missouri Revised Statutes Chapter 34, State Purchasing and Printing
 - Missouri Rules of Office of Administration Division 40 Purchasing and Materials Management
 - ► Cooperative Procurement Option
 - If utilizing state contract, procurement documents (quotes/bids) and invoice must reference state contract number

State of Missouri Procurement Requirements

Less than \$10,000

 Purchase with prudence on the open market

\$10,000 - \$99,999

- · Must be competitively bid
- · Informal method is acceptable
- Minimum of 3 bids/quote
- Ex. Telephone quote, online pricing, request for quotation

Greater than \$100,000

- Formal solicitation required
- Advertised in at least two daily newspapers for general circulation at least 5 consecutive days before bids are to be opened
- May also advertise in at least 2 weekly minority newspapers & provide through an electronic medium available to general public
- Post a notice in a public area of your office
- Solicit by mail or other reasonable methods generally available to the public
- OHS must approve if less than 3 bids received

A single feasible source procurement of \$10,000.00 or more requires prior approval from the OHS

Single Feasible Source (SFS)

- ▶ Use of a single feasible source procurement of \$10,000.00 or more requires prior approval from the OHS
 - ► A single feasible source form can be located on the DPS website in the <u>Grant Applications and Forms section</u>
 - ▶ 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

- Use of single feasible source procurement is discouraged. A single feasible source procurement exists when:
 - ▶ 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
 - ► <u>State of Missouri Office of Administration Vendors Under Suspension/Debarment</u>
 - *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
 - ► MUST include Federal Contract Provisions located at <u>2 CFR 200 Appendix II Contract</u> Provisions for Non-Federal Entity Contracts Under Federal Awards
 - ▶ Examples where contracts are needed include services for contracted security personnel, training, equipment installation, and construction
 - ► Single Feasible Source
 - ▶ Projects requiring an Environmental Planning and Historic Preservation (EHP)
 - ▶ All NSGP projects

If prior approval is not received, the expense will not be paid!

No Retroactive 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 <u>Federal Audit Clearinghouse</u> within 9 months after the close of each fiscal year during the term of the award
 - ▶ Expended funds include all Federal funds, not just NSGP funds

Environmental Historic Preservation (EHP) - All NSGP Projects

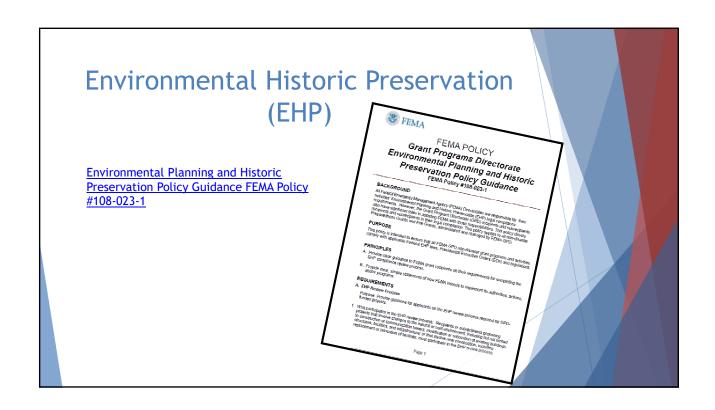
- ▶ Projects that involve changes to the natural or built environment
 - ▶ An EHP review is an analysis of pertinent project information to determine whether a project may have the potential to impact environmental or historical/cultural resources
 - ▶ Including but not limited to: construction of communication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





No Retroactive Approvals





EHP Timeframe

► 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



EHP Packet

The EHP form can be located on the DPS website in the <u>Grant Applications and Forms</u> section:

Make sure your EHP Form includes

- ▶ 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.)

Be sure you are using the current form - look for the expiration date in the right-hand corner

We will be offering an optional training that will go into further detail on completing the EHP Form - time and date TBD

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.

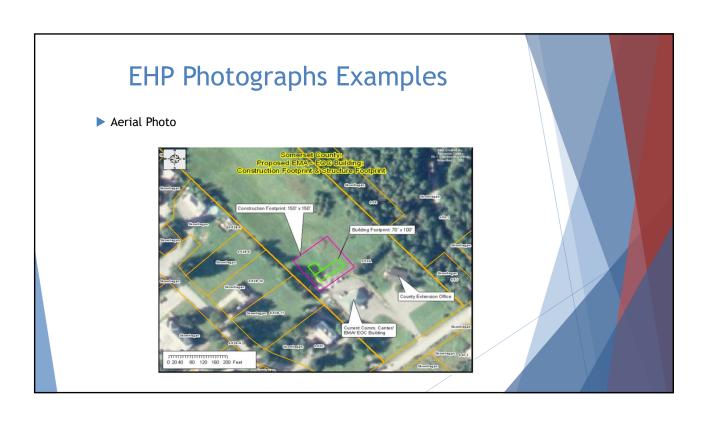
- Labeled, color, aerial photograph of the project site
- Labeled, color, ground-level photographs of the project site
- ► Labeled, color photograph of each location where equipment would be attached to a building or structure (interior and exterior)
- ► Label all photographs with the name of facility, location (city/county, state) and physical location (physical address or latitude-longitude)
- ▶ Identify ground disturbance including Length x Width x Depth
 - Adding graphics to a digital photograph is a means to illustrate the size, scope and location of ground disturbing activities
 - ▶ Include details of any fill materials involved in ground disturbances

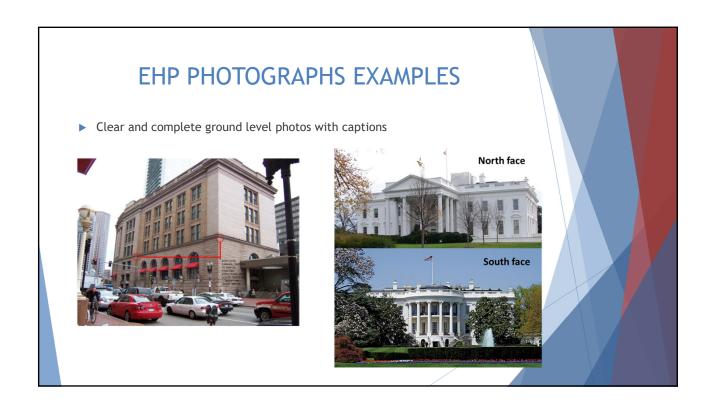
EHP Supporting Photographs

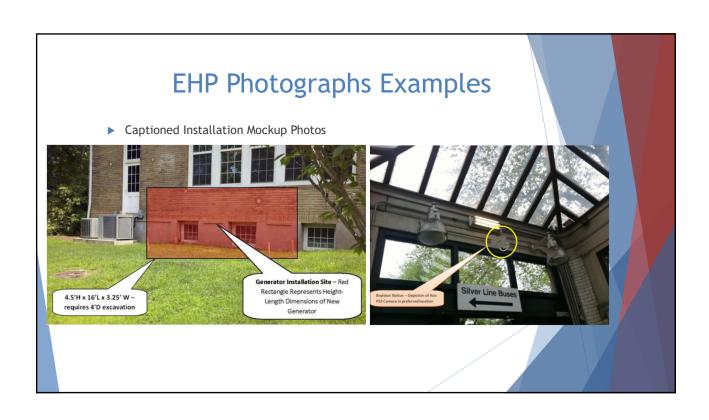
If Available:

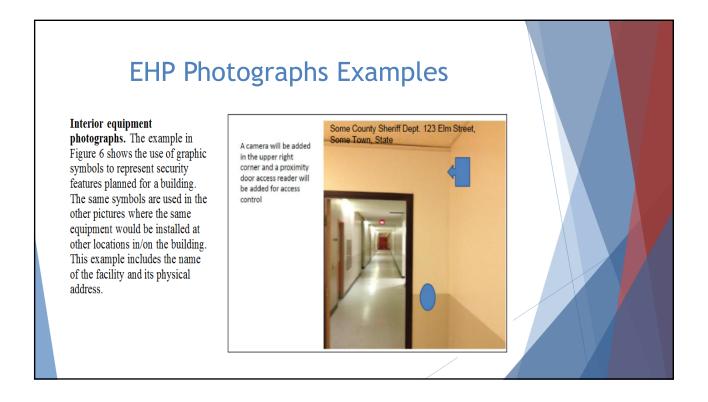
- ► Labeled, color ground-level color photographs of the structure from each exterior side of the building/structure
- ► Technical drawings or site plans











EHP 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
- ► Submit forms via Correspondence in WebGrants
- ▶ Questions: Debbie Musselman (573) 751-5997

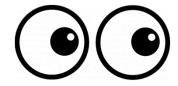
- ▶ Equipment is defined as tangible, personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost of \$1,000 or more
- ► Entities may have a lower acquisition cost in their procurement policy. If so, they MUST use the most stringent policy

- All equipment purchased with Nonprofit Security Grant Program funds MUST be tagged*
- ▶ All tags must state:

Purchased with U.S. Department of Homeland Security Funds

► Tags are available from the OHS upon request. Contact Maggie Glick at Maggie.Glick@dps.mo.gov

- 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



- ▶ Equipment must be protected against loss, damage and theft
 - ▶ Per <u>2 CFR 200.310</u>: 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
- Equipment must be maintained to keep it in mission capable (operational) condition

- ▶ Required to maintain inventory form for all equipment purchased with NSGP funds
- ▶ Equipment is added to OHS inventory at the time of claim approval
- ▶ Physical inventory MUST be taken and results reconciled once every two years
 - ▶ Next inventory will be due October 1, 2024
 - ▶ OHS will send list of your agency's inventory for verification



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
- ▶ EGMS/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)
- Use (Local, Regional, National, Statewide)
- ► Readiness Condition (Mission Capable/Not Mission Capable)
- ▶ Final Disposition
- Date of Final Disposition
- ► Final Disposition Sale Price
- Contact Name
- Contact Email
- ► Contact Phone Number

- ▶ When original or replacement equipment acquired with Homeland Security 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
- Disposition requests should be submitted on a timely basis. Disposition requests should not be held and submitted for approval at the time of the biannual physical inventory

- ▶ 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 in the <u>Grant</u> <u>Applications and Forms</u> section

- ► 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

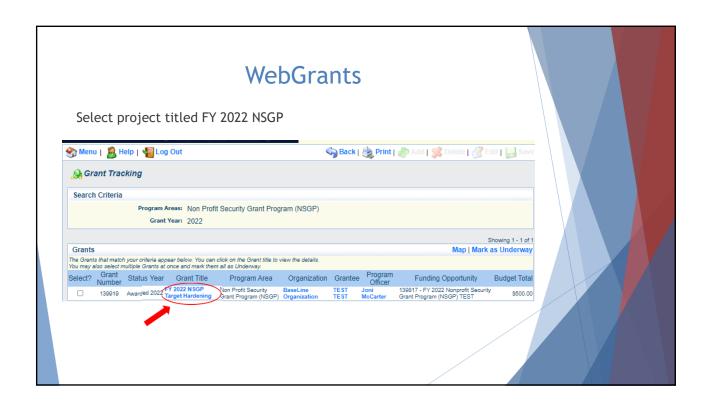


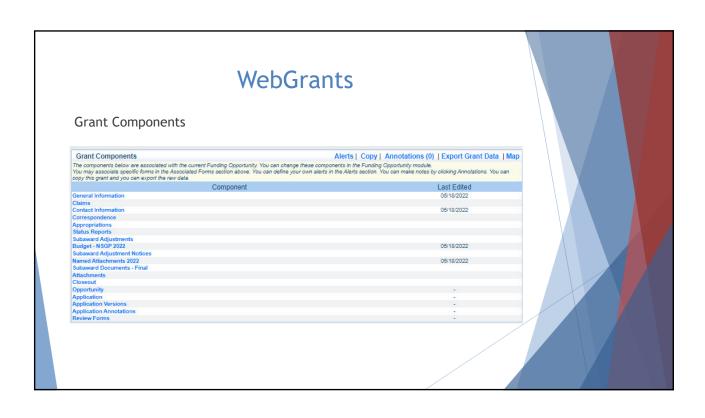
If sold, the Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from the sale by the Federal awarding agency's percentage of participation

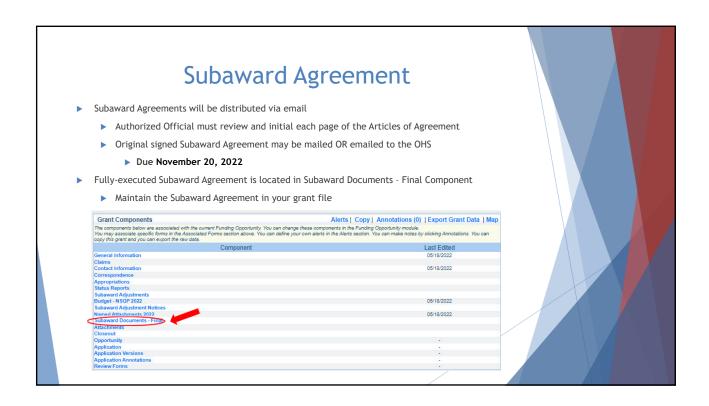
▶ Example: Region X wants to sell their 2009 F150, which was 75% funded with Homeland Security funds and 25% funded with local funds. The fair market value for their 2009 F150 was \$6,000.00. The Federal awarding agency would be entitled to \$4,500.00 of the proceeds and the local agency would be entitled to \$1,500.00

WebGrants Login to the WebGrants using the same User ID and Password used when submitting the application Log In User ID+* Fraget User RF Reset Password An email nas been sent to the email address listed in your user profile with a one-time passcode. Please enter the passcode. Please enter the passcode. Please enter the passcode below. Password Inset Passw



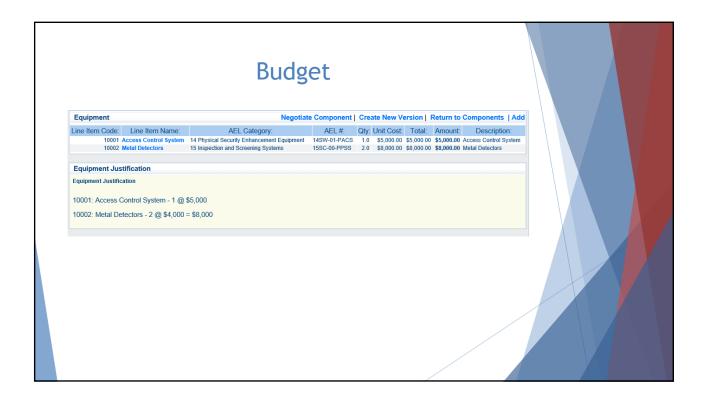






Budget

- Approved budget is located in Budget Component
 - ▶ Approved budget is based upon approved items in the Investment Justification
 - ▶ Be sure to review approved budget before beginning procurement
 - ▶ Ensure you are only purchasing items that are on approved budget
 - ▶ Ensure you are purchasing the quantity of items that is on approved budget
 - ▶ Request Subaward Adjustment if need to make changes to budget (i.e. change in amount of funding on one budget line vs. another)



Expending Grant Funds

- ► Funds must be obligated within the project period of performance, expended, and submitted for reimbursement within 45 days following the project period of performance end date (October 15, 2024)
- ▶ Project Period: September 1, 2022 to August 31, 2024
- ► Funds are considered "obligated" when a legal liability to pay a determinable sum for services or goods is incurred and will require payment during the same or future period
- ▶ Funds are considered "expended" when payment is made

Expending Grant Funds

- ▶ <u>NO</u> work on the project can be started until all of the following are completed
 - Subaward Agreement fully executed
 - ▶ FEMA funding hold released, if applicable
 - ▶ OHS will contact you to let you know what information is needed
 - Environmental Historic Preservation Clearance has been received by DHS/FEMA

Contracts

- All contracts MUST be approved by the OHS prior to signing
 - ▶ Submit contracts for review through WebGrants Correspondence
- ► All contracts MUST contain the Federal Contract Provisions located in 2 CFR 200 Appendix II Contract Provisions for Non-Federal Entity Contracts Under Federal Awards

Reimbursement Requests

- ► Information Bulletin 5: Policy on Reimbursement Requests discusses requirements for reimbursement requests
- Vendor Input Form
 - ▶ If your agency is not setup with a vendor to receive payment from the State of Missouri this form will need to be completed approximately 30 days before you anticipate submitting your first claim
 - ▶ MUST be completed in order to receive payment
- Must incur an allowable expense, make payment, and seek reimbursement within 6 months of the invoice date
- ▶ Supporting documentation must be submitted with each claim
- Incomplete claims could result in a delay of payment. It is the requesting agency's responsibility to complete the necessary changes

Reimbursement Requests

- ► Equipment Supporting Documentation
 - ▶ Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$1,000
 - ▶ Claim in WebGrants
 - Vendor Invoice
 - ▶ Proof of payment (i.e., copy of cancelled check, credit card statement, bank statement)
 - Proof of delivery/completion (i.e., signed packing slip, receipt, or signed statement in writing indicating items delivered)
 - Purchase order, if one was created or referenced on an invoice
 - ▶ Equipment Inventory Form in WebGrants must be completed for each piece of equipment
 - If you purchased, more than one of the same item, they must be listed separately on the equipment inventory form
 - ▶ Please submit pictures of the installed equipment if available

Reimbursement Requests

- Contractual Supporting Documentation
 - ► Claim in WebGrants
 - Vendor Invoice
 - Proof of payment (copy of cancelled check, credit card statement, bank statement)
 - ▶ Proof of delivery (signed statement in writing indicating goods/services received)
 - Copy of signed contact must be submitted with first claim
 - ▶ Other documentation required by contract (milestone reports, time and effort)

Reimbursement Requests

- Management and Administration (M&A) Supporting Documentation -Goods/Services
 - ► Claim in WebGrants
 - ▶ Invoice (example: temporary clerical support/invoice)
 - ▶ Proof of payment (copy of cancelled check or payroll journal)
 - Proof of delivery (signed packing slip, receipt, or statement in writing indicating goods/services received)

Reimbursement Requests

- Management and Administration (M&A) Supporting Documentation -Personnel Costs
 - ► Claim in WebGrants
 - ▶ Invoice (example: temporary clerical support/invoice)
 - ▶ Proof of payment (copy of cancelled check or payroll journal)
 - ► Timesheet(s)
 - Wage and benefit cost(s)
 - ► Signed salary certification

Reimbursement Request

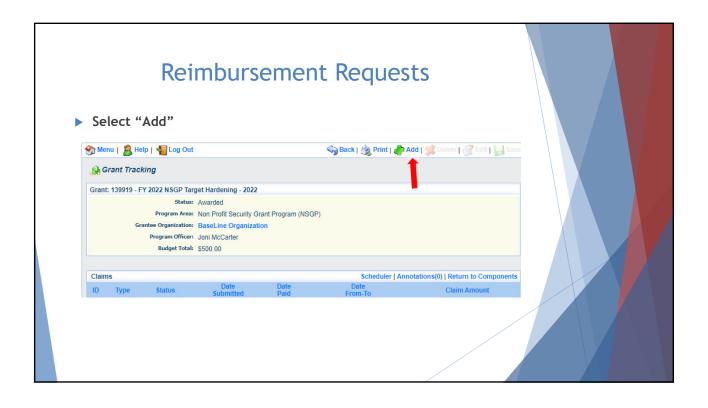
Advance Payment

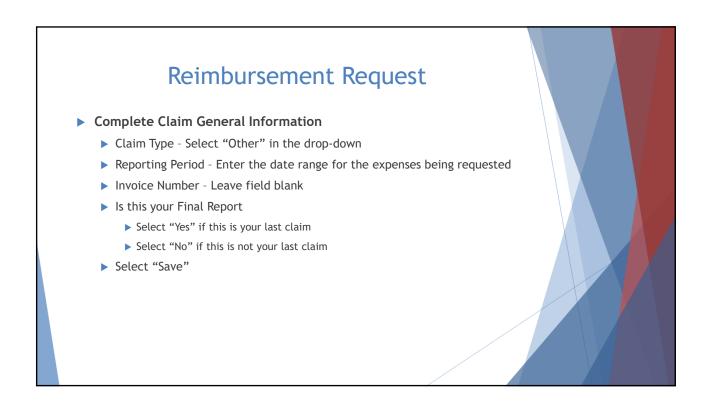
- ▶ <u>Information Bulletin 2: Policy on Advance Payment and Cash Advances</u> discusses requirements for advance payment requests
- Advance payment is defined as funds given to a subrecipient in advance of the subrecipient incurring the debt. For example, if a subrecipient orders a piece of equipment and requests reimbursement prior to paying the vendor's invoice, receipt of funds would be considered an advance payment
- Will not provide advance payment to a subrecipient before costs have been incurred through an invoice from a vendor
- > Some situations, cash flow makes payment for large equipment items difficult
- ▶ OHS has agreed to accept requests for funds from subrecipients as soon as a vendor submits their invoice and the subrecipient has received goods or services
- \$2,500 minimum for subrecipients requesting a reimbursement with an advance payment

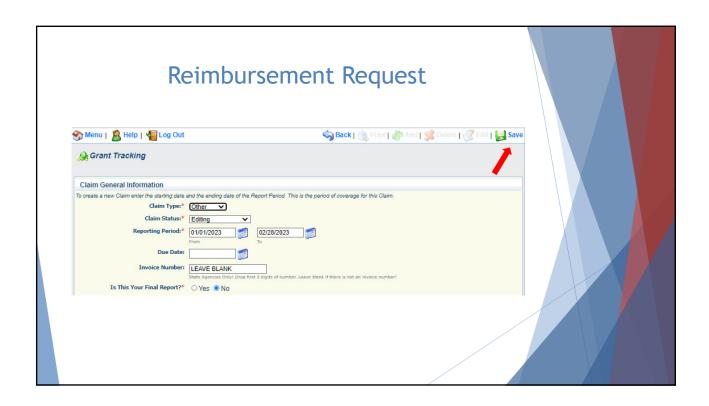
Reimbursement Request

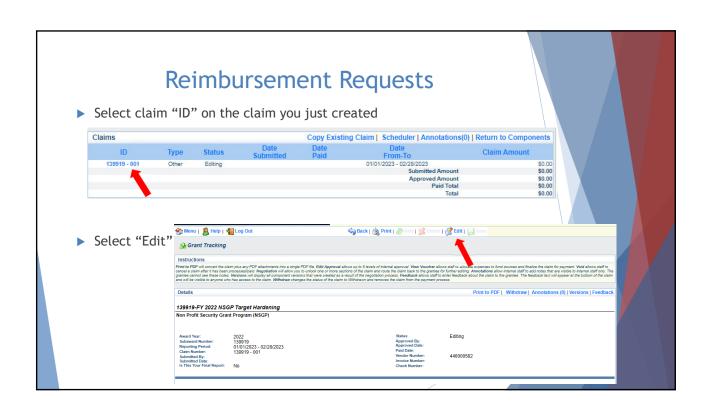
- Advance Payment Supporting Documentation
 - ► Claim in WebGrants
 - Vendor Invoice
 - ▶ Proof of delivery/completion (i.e., signed packing slip, receipt, or signed statement in writing indicating items delivered)
 - ▶ Completed Equipment Detail Form in WebGrants, if applicable
- ▶ Required to submit proof of payment (i.e., copy of cancelled check, credit card statement, or bank statement) to the OHS within 30 days from receipt of payment
- ▶ To request, type "Advance Payment" in the Check/EFT Number and Check/EFT Date fields in the WebGrants claim

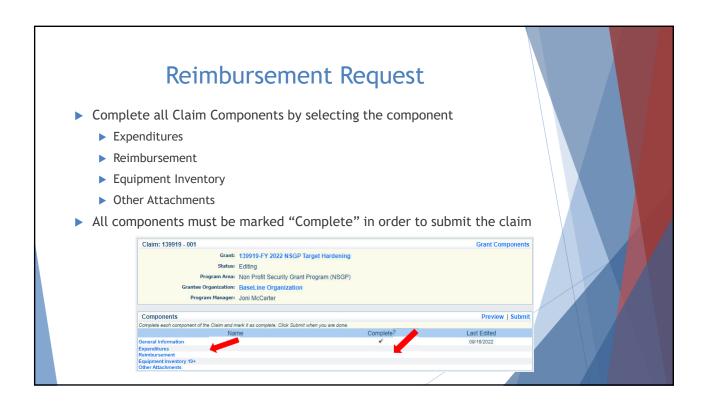


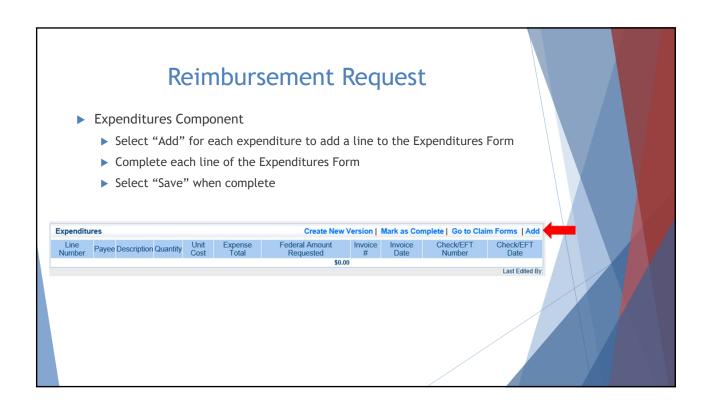


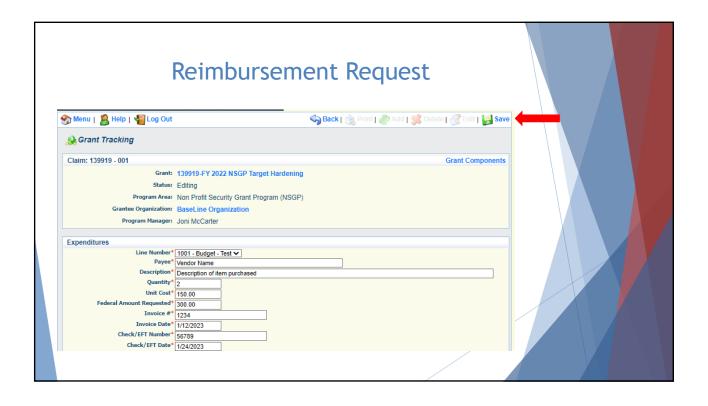


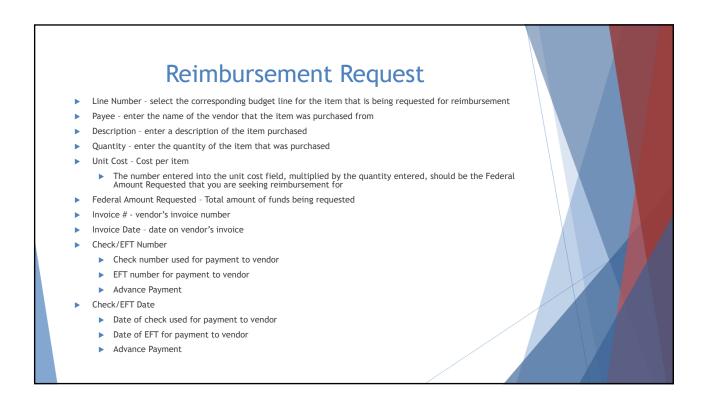


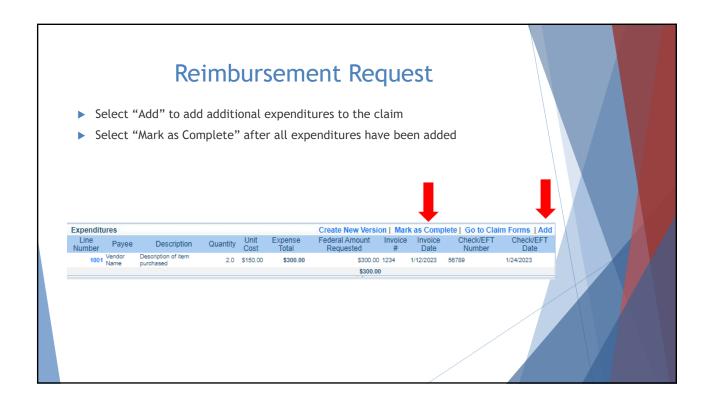


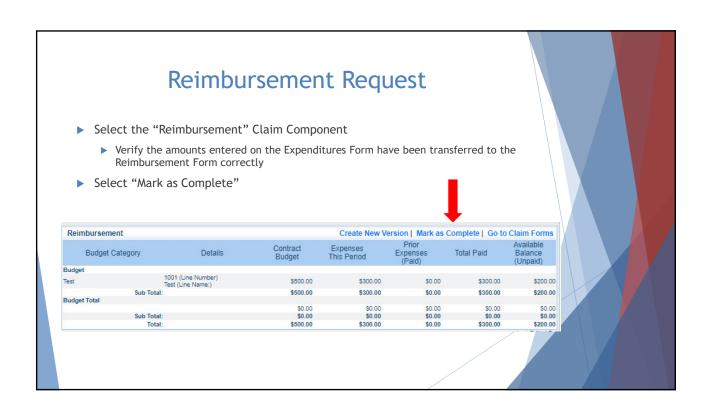


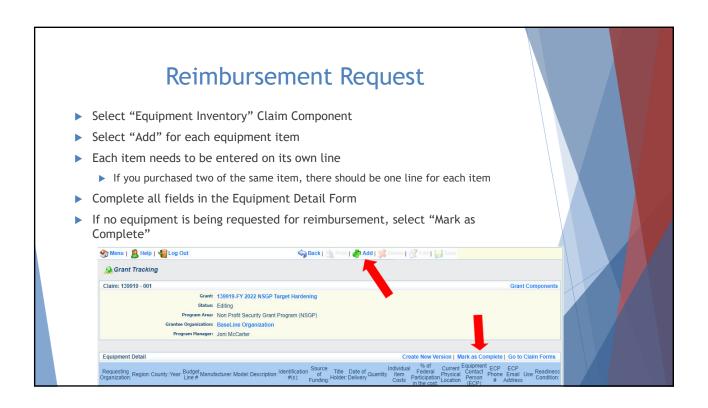










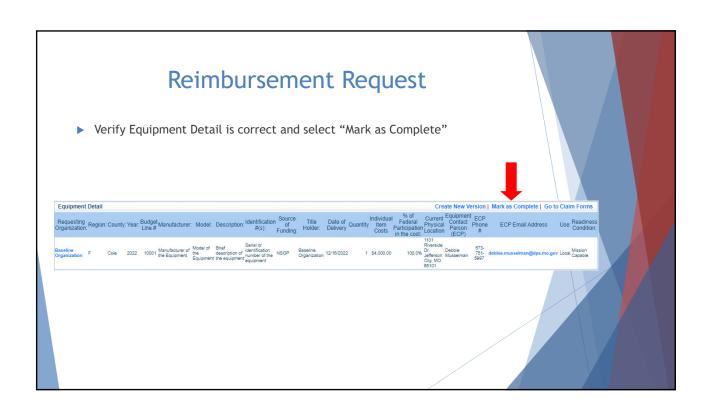


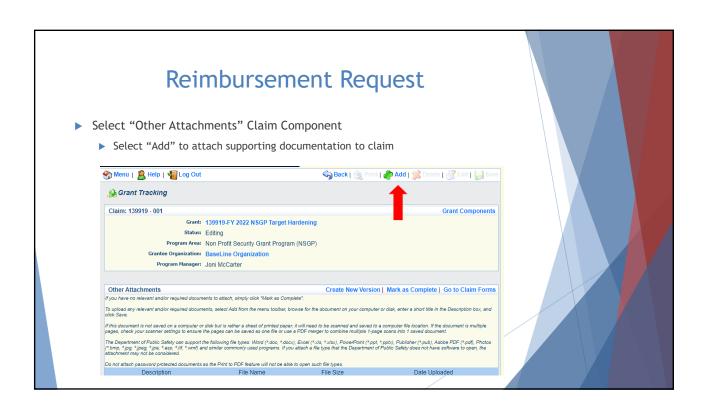
Reimbursement Request

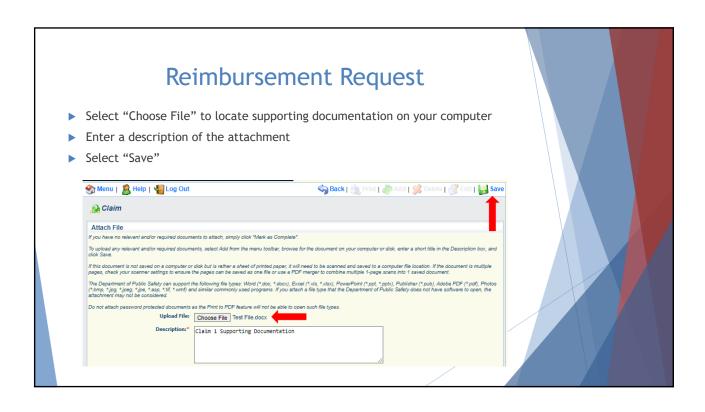
- ▶ If equipment is requested, complete all fields in the Equipment Detail Form
- ▶ Requesting Organization Subrecipient's Organization
- Region Subrecipient's Region
- County Subrecipient's County
- ► Year Grant year the equipment was purchased (2022)
- ▶ Budget Line # Budget line number associated with the equipment
- Manufacturer Manufacturer of the equipment
- Model Model number of the equipment
- Description Description of the equipment (i.e., access control system, bollard, video surveillance system)
- ▶ Identification # Unique identification numbers such as serial number. N/A should be annotated in there is not a serial number
- Source of Funding Federal Funding utilized (NSGP)
- ▶ Title Holder Subrecipient Organization who owns the equipment

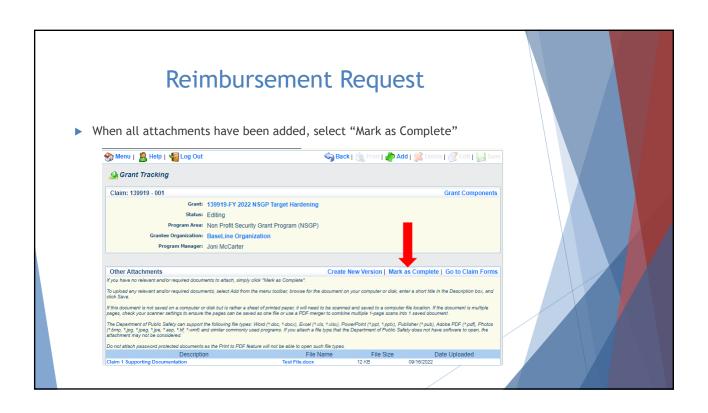
Reimbursement Request

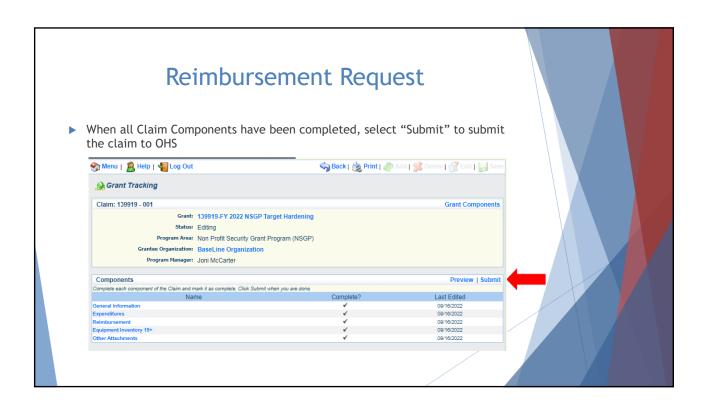
- Date of Delivery Date equipment was delivered
- Quantity Number of equipment items purchased (should only be one per line)
- ▶ Individual Item Costs Cost of individual equipment item
- % of Federal Participation in the Cost Percentage of cost of the equipment that is being requested
- Current Physical Location Address where the equipment is located (P.O. Box is not a physical location for the inventory)
- ▶ Equipment Contact Person (ECP) Name of person to contact regarding equipment
- ▶ ECP Phone # Phone number for equipment contact person
- ▶ ECP Email Address Email address for equipment contact person
- Use Local, regional, statewide, or national. Progressive scale. If national use is entered, it is assumed it is available at all other levels
- Readiness Condition
 - Mission capable material condition of equipment indicating it can perform at least one and potentially all of its designated missions
 - Not mission capable material condition indicating that equipment is not capable of performing any of its designated mission











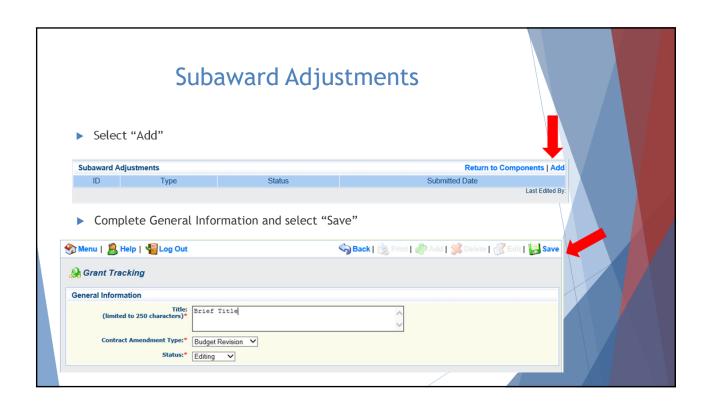
Subaward Adjustments

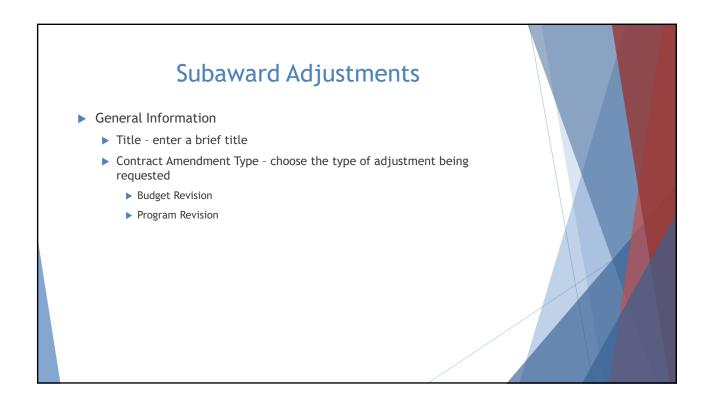
- ► Information Bulletin 8: Policy on Budget Modifications, Scope of work Changes, and Spending Plan discusses Subaward Adjustments
- Budget Modifications transfer among existing budget lines within the grant budget
 - Request for budget modification must be submitted through WebGrants as a Subaward Adjustment and must be approved by the OHS prior to the subrecipient obligating or expending the grant funds
- ▶ Program Modifications
 - Request for program modifications must be submitted through WebGrants as a Subaward Adjustment and must be approved by the OHS prior to the subrecipient obligating or expending the grant funds
 - Program modifications include:
 - ► Changes in subrecipient staff (Authorized Officials, Project Directors, or Fiscal Officers)
 - ▶ Address change or other information in the organization component of WebGrants
 - Request to change project period of performance

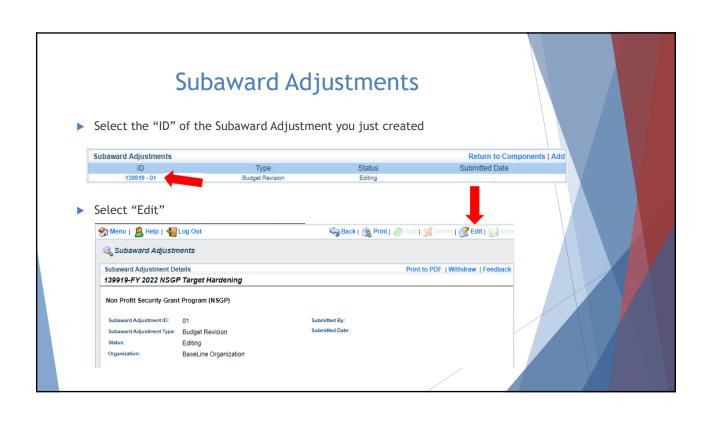
Subaward Adjustments

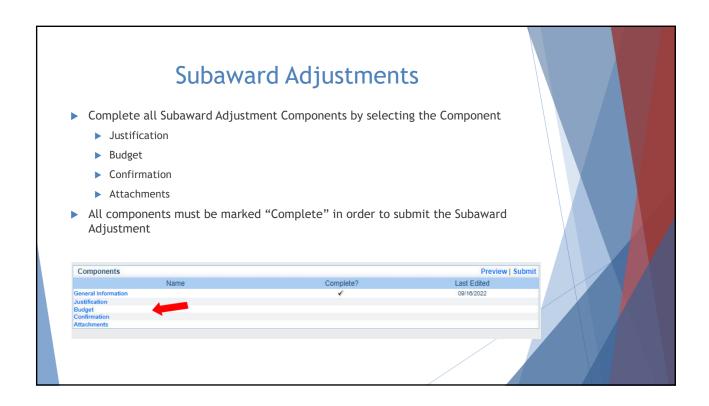
- Scope of Work Changes
 - ▶ Adding new line items to the approved budget
 - ▶ Changes in quantity of an existing line item in approved budget
 - ▶ Changes to specifications of existing line item (i.e., an equipment line item on the approved budget lists a 12'x 20' tent, in order to purchase a tent that is 10' x 10' instead of the listed equipment, prior approval is required
- Approval to change scope from approved Investment Justification is extremely rare
 - NSGP is a competitive grant program. The expectation is that all components of the project in the original Investment Justification will be completed
 - Contact your grant specialist immediately if there is a problem with the scope of the project

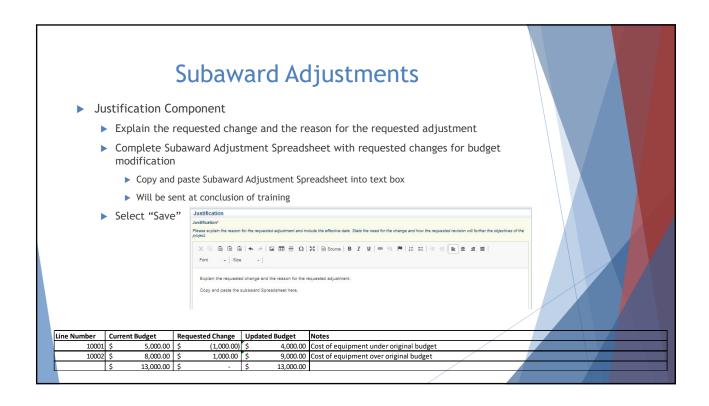
Submitting a Subaward Adjustment in WebGrants Select "Subaward Adjustments" component in WebGrants Grant Components Alerts | Copy | Annotations (0) | Export Grant Data | Map The components below are associated with the current Funding Opportunity You can change these components in the Funding Opportunity You can change these controllers in the Alerts section. You can make note by circling Annotations You can copy in a great and pow and export the arm calls Component General Information Custed Information Contract Informatio

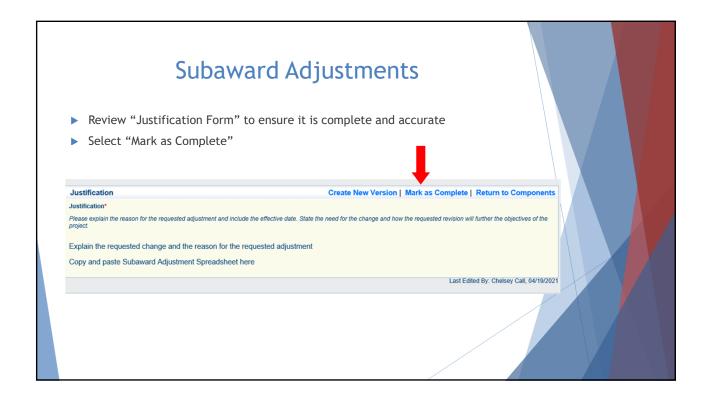


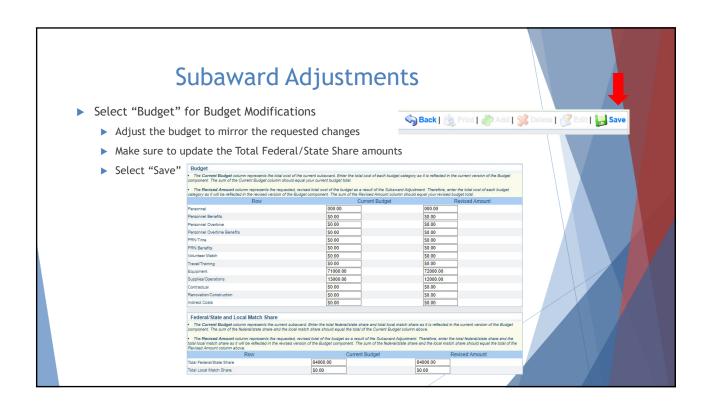


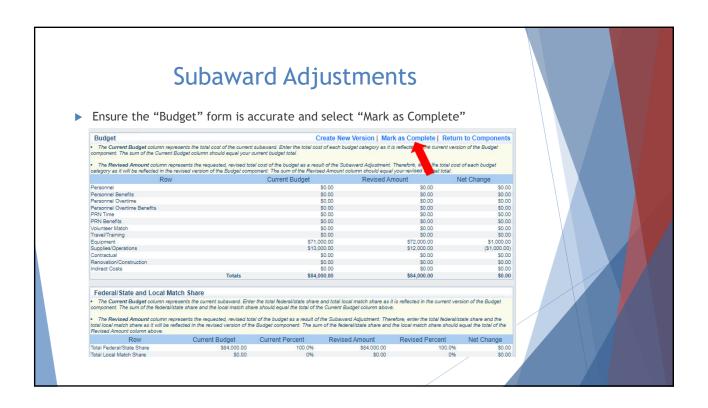


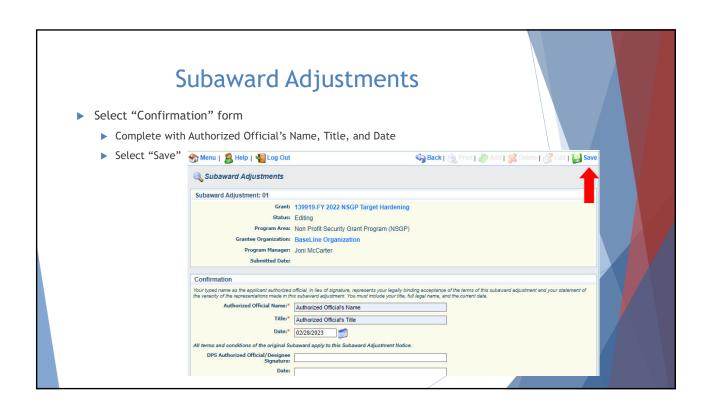


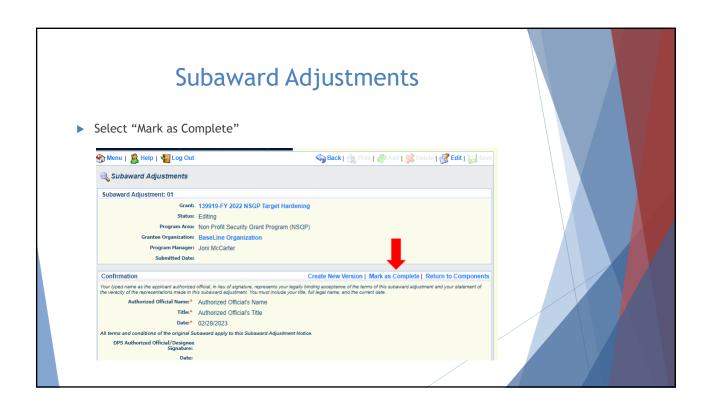


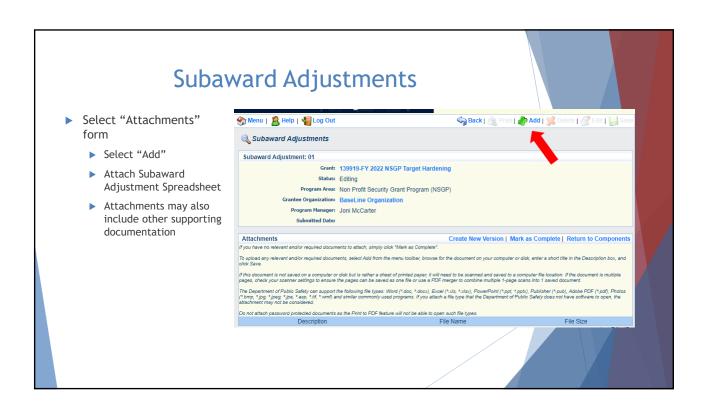


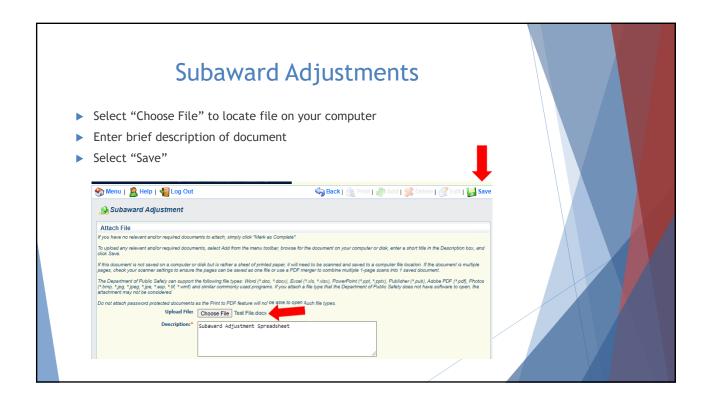


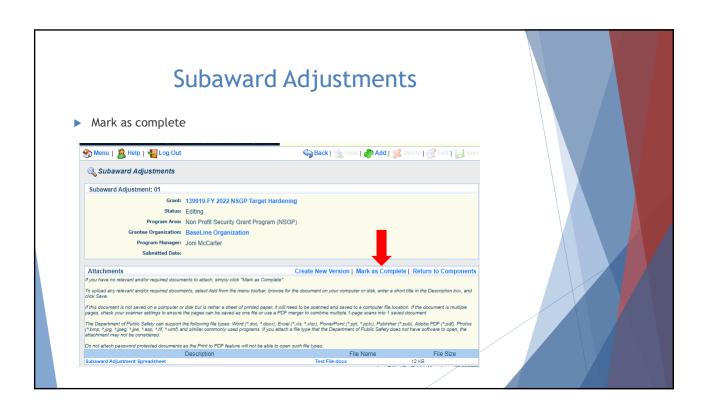


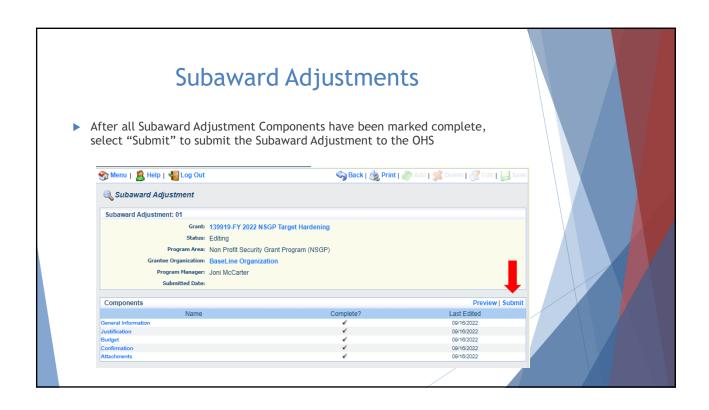


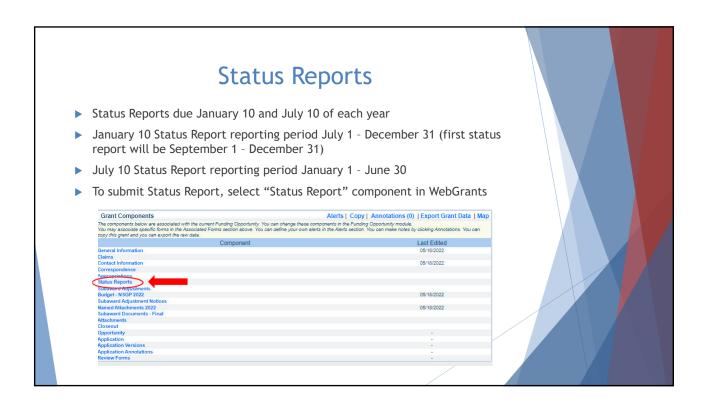


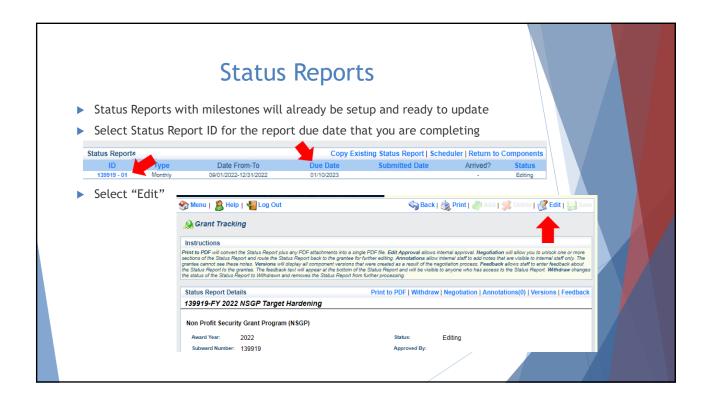


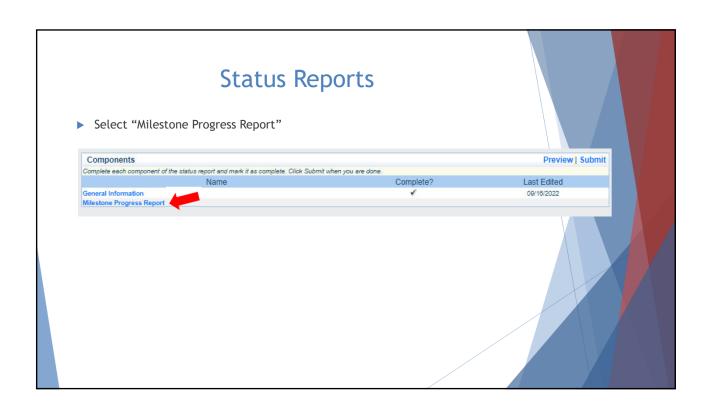


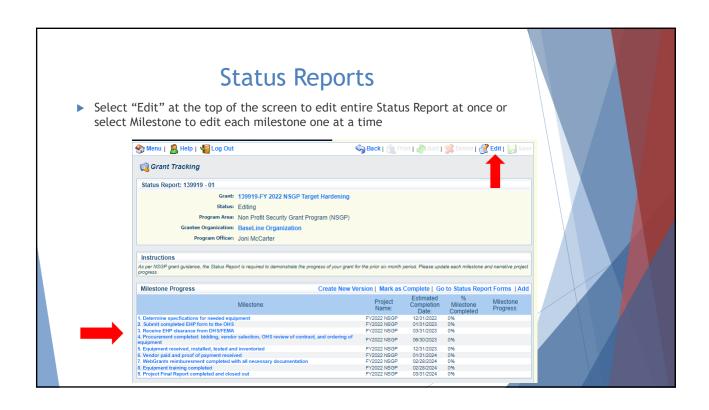






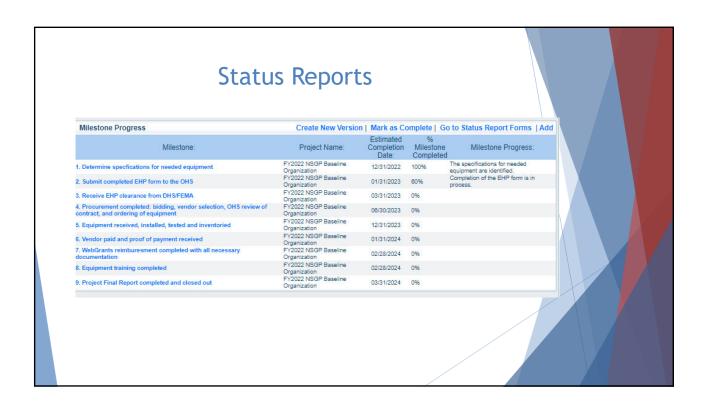


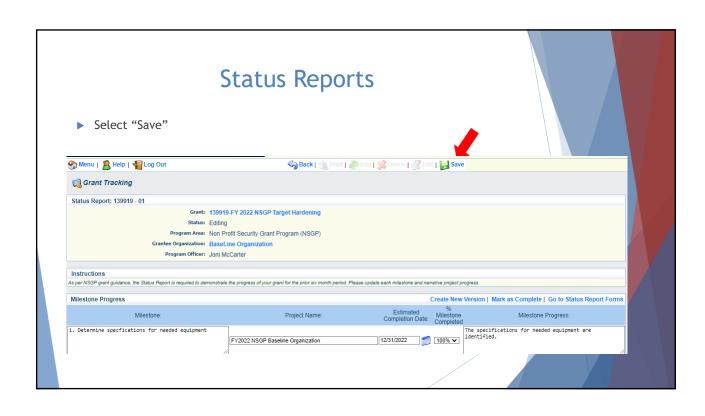


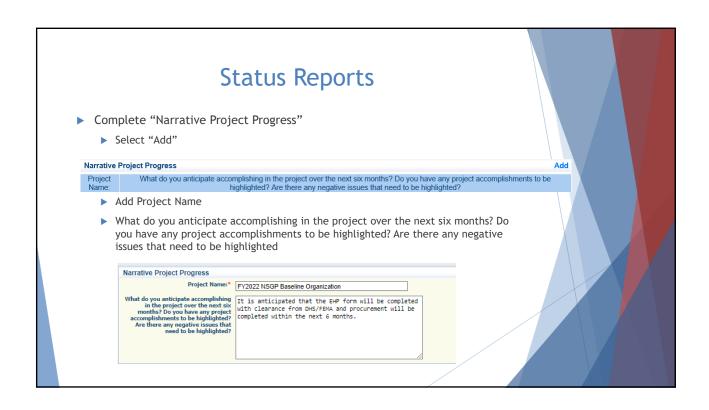


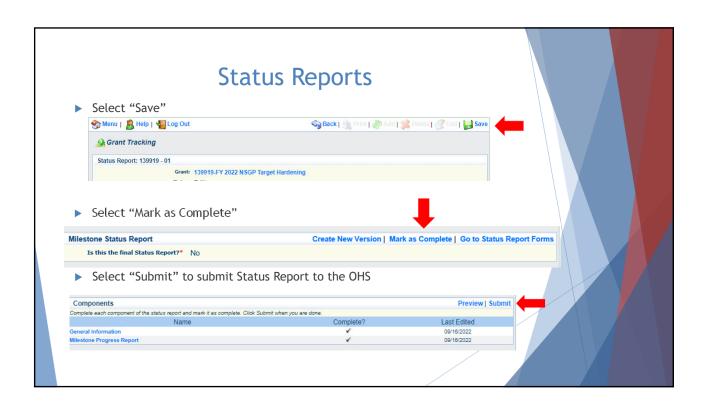
Status Reports

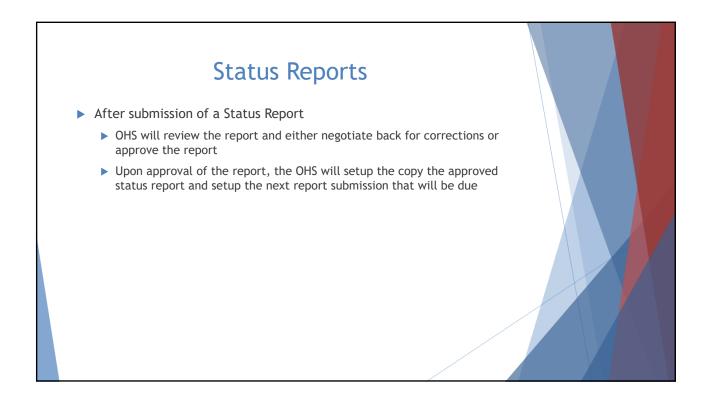
- ▶ Complete "Milestone Progress" section of Status Report
- Milestone Do NOT change any of the Milestone descriptions and do NOT add any Milestone descriptions
- ▶ Project Name Brief project name (i.e., FY 2022 Baseline Organization NSGP)
- Estimated Completion Date Estimated completion date for milestone at time of status report
- % Milestone Completed Estimated % of milestone completed at time of status report
- Milestone Progress Enter pertinent notes on milestone (i.e., Specifications for equipment complete)

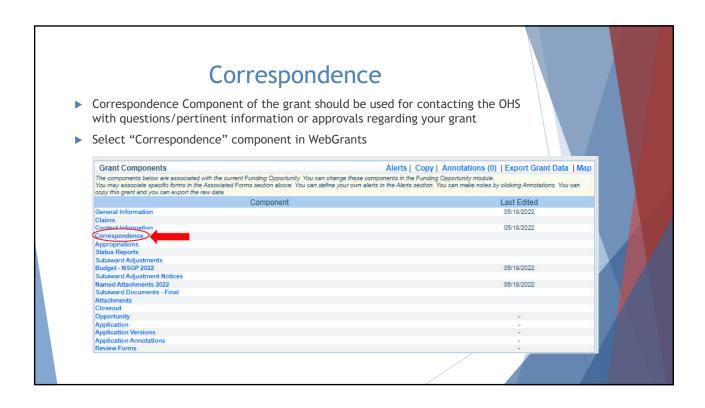


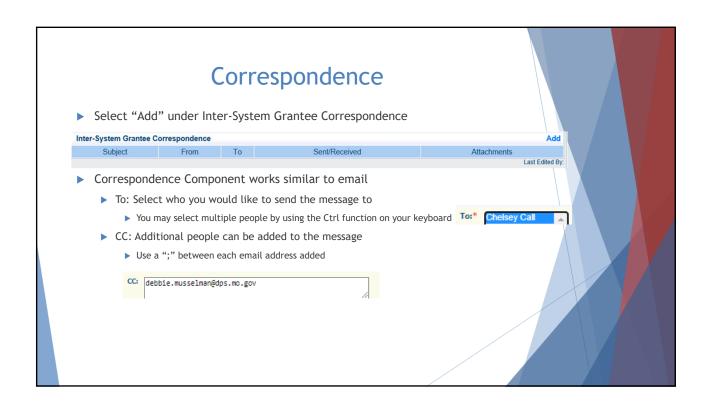


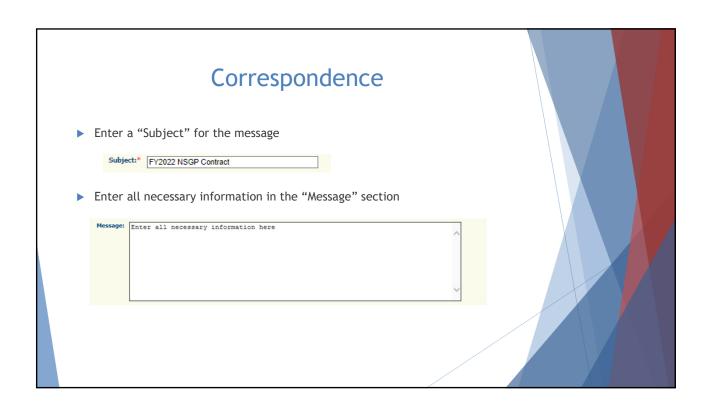


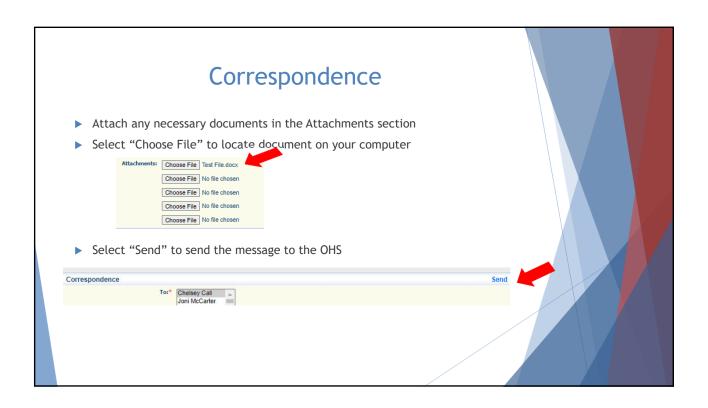


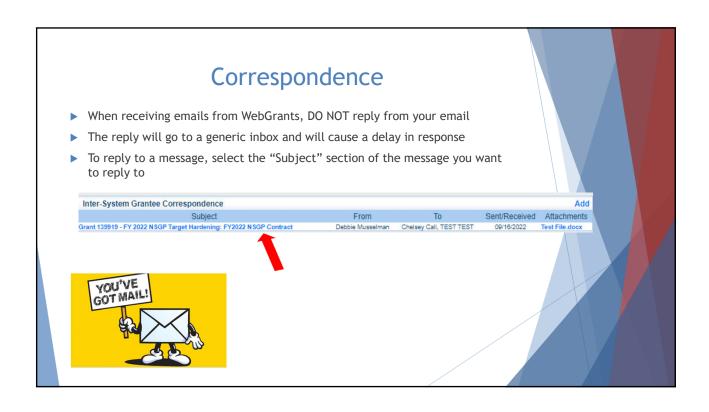


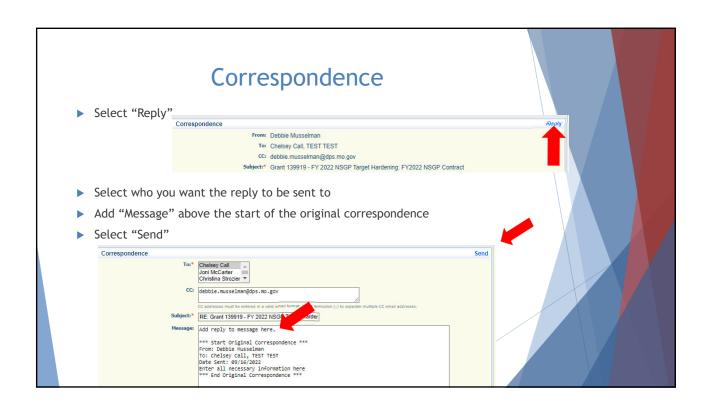












Grant File

- ▶ All grant records shall be retained by the subrecipient for:
 - At least 5 years from the end of the state fiscal year in which the grant closes or following notification by the awarding agency that the grant has been programmatically and fiscally closed or at least 5 years following the closure of the subrecipient's audit report covering the entire award period, whichever is later
- ▶ Subrecipient should maintain grant file with grant documentation including but not limited to:
 - Copy of grant application(s) WebGrants submission with Investment Justification, Risk/Vulnerability Assessment, etc.
 - Subaward Agreement (Fully Executed)
 - ▶ EHP Submission and Clearance documentation
 - ▶ Fully Executed Contracts
 - Approved Claims
 - Approved Subaward Adjustments
 - ► Approved Status Reports
 - ▶ Final Status Report
 - Monitoring Reports
 - Relevant Grant Correspondence
 - Procurement Documents
 - Disposition of Equipment Forms
 - Inventory

Grant Closeout

- Grant Period of Performance ends 08/31/2024
- ► Final Claims and Final Status Report are due 45 days after the end of the period of performance (10/15/2024)
- ► Final Claim Select "Yes" in "General Information" on the question "Is this your Final Report"
- ► Final Status Report
 - ▶ In the "Narrative Project Progress" section indicate that the project is complete and this submission is the Final Status Report.
 - Include amount of de-obligated funds, if applicable, in the Narrative Project Progress section

Monitoring

- ▶ Information Bulletin 1: Policy on Monitoring discusses monitoring
- ▶ The OHS acts as a pass-through entity and is subject to the requirements of passthrough entities guided by 2 CFR 200
- ▶ 2 CFR 200.332 (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"
- ▶ Types of Monitoring
 - ▶ Desk Review that is completed by the OHS at the OHS' office
 - ▶ On-Site Review that is conducted by the OHS at the subrecipient's agency



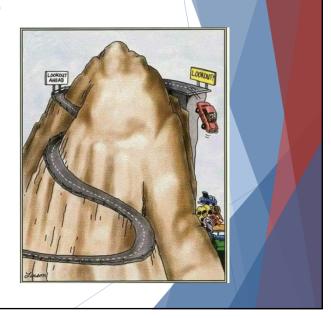


Monitoring

- Scheduling
 - ▶ Agreed upon date between OHS and subrecipient
 - ▶ Given at least 30 days notice
- ▶ Topics Covered
 - ▶ See Monitoring Information Bulletin
- Corrective Actions
 - ▶ If observations are made, at least 30 days will be allowed to complete and submit necessary corrective actions

Monitoring

- ► Monitoring is NOT an audit
- OHS is NOT out to catch you doing something wrong - we are there to HELP correct areas of noncompliance to prevent audit findings
- Change to provide technical assistance and answer questions





Follow-up Information

- ▶ Each subrecipient will be sent the following items via email:
 - Subaward Agreement
 - ▶ Award and Compliance Workshop Confirmation Acknowledgement
 - ▶ Link to Compliance Workshop PowerPoint
 - ▶ Links to Administrative Guide and Information Bulletins
 - ► Link to EHP form
 - ▶ Link to Single Feasible Source (SFS) Form
 - ▶ Grant Checklist

Next Steps

You will receive a very detailed checklist for your project - below are just the first steps

Funding Hold

- Return your Subaward Agreement, signed by the correct Authorized Official, the 501c3 paperwork, and the Award and Compliance Workshop Confirmation Acknowledgement
- The Subaward Agreement will then be fully executed by the Missouri Department of Public Safety and uploaded into WebGrants
- We will reach out to you for the follow-up information needed by FEMA in order for your funding hold to be released
- **DO NOT COMPLETE ANY WORK ON THE PROJECT UNTIL YOU HAVE BEEN NOTIFIED THE FUNDING HOLD HAS BEEN RELEASED**

No Funding Hold

- Return your Subaward Agreement, signed by the correct Authorized Official, the 501c3 paperwork, and the Award and Compliance Workshop Confirmation Acknowledgement
- The Subaward Agreement will then be fully executed by the Missouri Department of Public Safety and uploaded into WebGrants
- Your project will be marked "Underway" in WebGrants and you will be able to view it
- Begin gathering items for the EHP submission

Do NOT sign any contracts or place any orders until you have been instructed!!



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