FY 2022 State Homeland Security Program (SHSP) Regionalization

Grant Award and Compliance Workshop
October 11, 2022

Agenda

- Welcome

- Grant Requirements

- Environmental Historical Preservation

- Inventory

- WebGrants

- Pass-Through Requirements

- Monitoring

Grant Requirements

Missouri Office of Homeland Security Administrative Guide and Information Bulletins (IB)

- 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

  - OHS-GT-2012-005 - Policy on Claim Request Requirements Including OHS Reimbursement Checklist

Missouri Office of Homeland Security Administrative Guide and Information Bulletins (IB)

- 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 2022 Homeland Security Grant Program (HSGP) https://www.fema.gov/grants/preparedness/homeland-security/fy-22-nofo
  - Provides programmatic requirements specific to the State Homeland Security Program (SHSP)

- Grant Programs Directorate (GPD) Information Bulletins (IBs) https://www.fema.gov/grants/preparedness/about/informational-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 via email
  - Original, signed, Subaward Agreement must be mailed to the OHS
    - **Due November 15, 2022**

- OHS will upload executed subaward agreements to WebGrants
  - Subrecipients may retrieve a copy of the executed subaward agreement from the **Subaward Documents – Final component** of the M&A project in WebGrants. A copy of the executed Subaward Agreement must be added to the subrecipient's grant file

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 FY 2022 Homeland Security Grant funds are required to complete the NCSR
  - Due December 31, 2022
  - **Failure to complete the review will result in loss of funding**

- Once all of your region's NCSR's are complete, send all Completion Certificates via email to Maggie Glick (Maggie.Glick@dps.mo.gov)

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
    - Have 1 year to complete
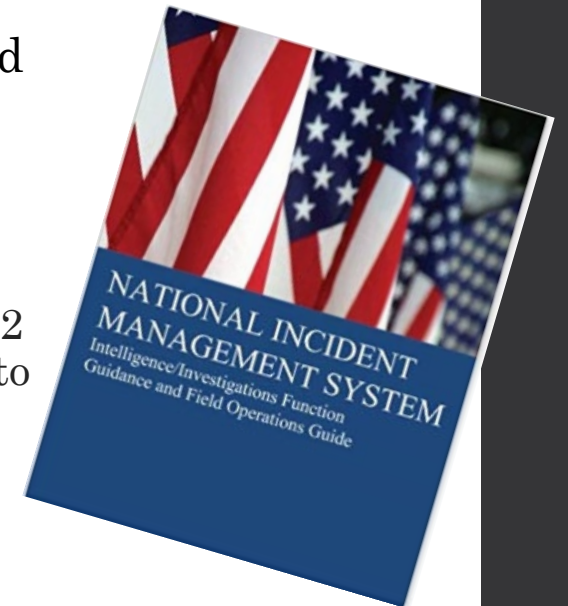
Procurement Requirements

- With any expenditure, the subrecipient must ensure that:
  - The expenditure is an approved budget line item
    - Reimbursements will **<u>NOT</u>** be made for items that are not an approved budget line item at the time of purchase
  - 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
  - Submit procurement policy via email to Kristin Kayser by November 15, 2022
  - 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
    - If utilizing state contract, procurement documents (quotes/bids) and invoice **must** reference state contract number

State of Missouri Procurement Guidelines

Less than $10,000	$10,000 - $99,999	Greater than $100,000
• Purchase with prudence on the open market	• Must be competitively bid • Informal method is acceptable • Minimum of 3 bids/quote • Ex. Telephone quote, online pricing, request for quotation	• 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

Single Feasible Source

- 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 https://dps.mo.gov/dir/programs/ohs/grantstraining/ > Grant Applications and Forms > Other Grant Forms (at bottom of listing)

  - 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:
    - 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/SAM/
  - 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 – must contain Federal Contract Provisions located in 2 CFR 200 Appendix II Contract Provisions for Non-Federal Entity Contracts Under Federal Awards https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/appendix-Appendix%20II%20to%20Part%20200
  - Single Feasible Source over $10,000
  - Projects requiring an Environmental Planning and Historic Preservation (EHP)
  - Training/Exercise Requests
  - Generator purchases
  - Items that require a federal waiver can be located in the IB's, examples of some of these items:
    - Boats
    - Unmanned Aerial Vehicles (drones/remote operated vehicles)
    - Explosives
- **Approval Requests must be submitted via WebGrants Correspondence for the associated project**

Training Request Forms

- Information Bulletin OHS-GT-2012-006-03

- If attending or hosting a training, a Training Request Form must be submitted to the OHS via WebGrants Correspondence

- Training Request Form must be submitted to the OHS 30 business days before anticipated training date

- Approved Training Request Form must be submitted as supporting documentation with claims containing expenses for training

- Training Request Form is located on our website: https://dps.mo.gov/dir/programs/ohs/documents/TrainingRequestForm.pdf

Travel Expenses

- Reimbursements for mileage and meal expenses cannot exceed the state of Missouri approved rates
  - Approved mileage rates: https://oa.mo.gov/accounting/state-employees/travel-portal-information/mileage
    - Last updated 07/01/2022
    - Current approved rate is $0.55 per mile
  - Approved meal per diem rates: https://oa.mo.gov/accounting/state-employees/travel-portal-information/meals-per-diem
    - Last updated 09/15/2022

Mileage/Meal rates do change – it is a good idea to review this information often

- Reimbursements for lodging cannot exceed the GSA approved rates
  - Exceptions do occur but you must verify it is acceptable with OHS

- GSA approved rates: https://www.gsa.gov/travel/plan-book/per-diem-rates?gsaredirect=portalcategory

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

Environmental Historic Preservation

Projects Needing An EHP

- Facility construction
- Modification/renovation of existing structures
- Physical security enhancements to buildings or structures
- Construction or modification of Communication towers
- All ground disturbances
- Training/exercises not a designated training facility (Ex. Water rescue training conducted on a river, lake, etc.)

- **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

https://www.fema.gov/sites/default/files/documents/fema_GPD-EHP-policy-final-amendment_82018.pdf
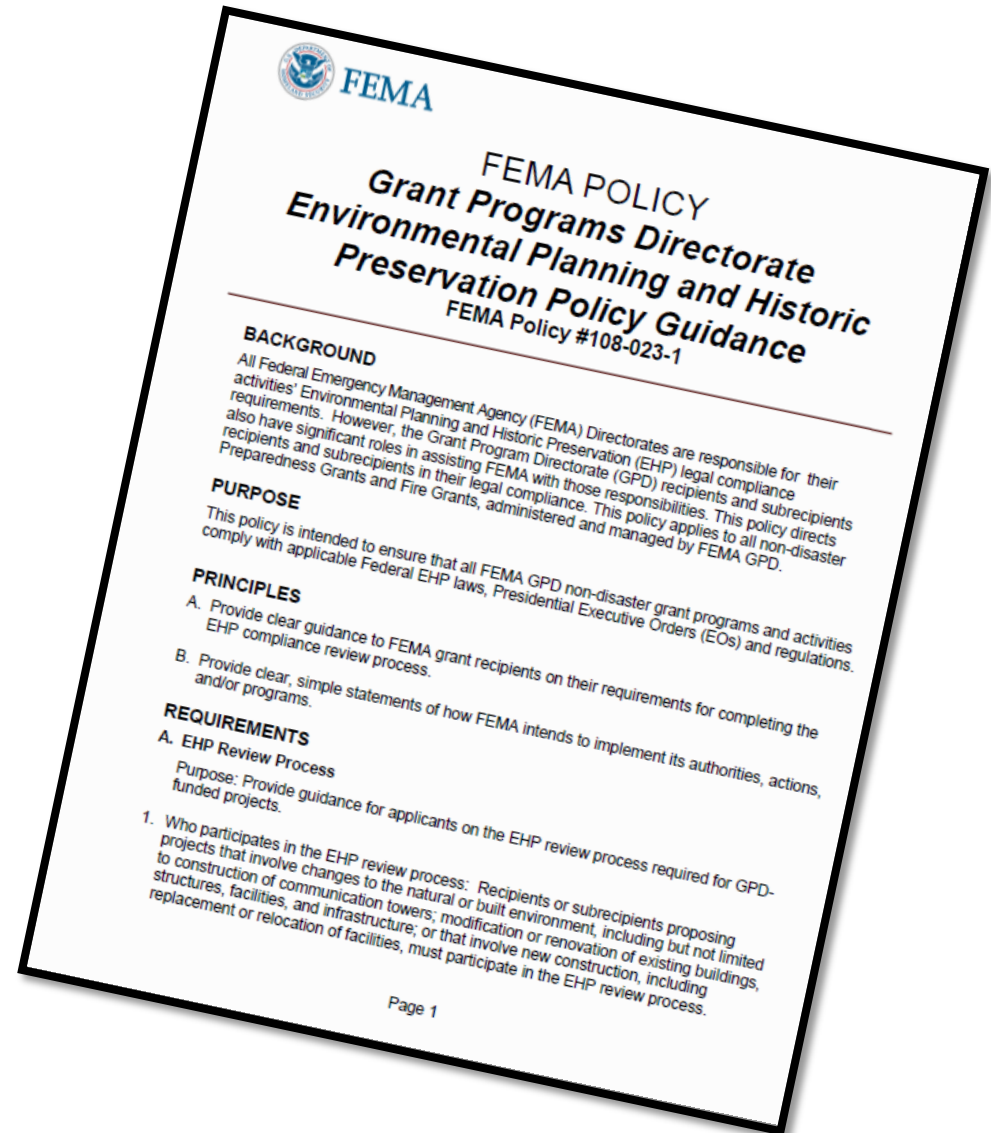
EHP Timeframe

- 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 the responsibility of and paid by the grant subrecipient

EHP Packet

The EHP form can be located on the DPS or FEMA website:

https://www.fema.gov/sites/default/files/documents/fema_ehp-screening_form_ff-207-fy-21-100_5-26-2021.pdf

- Make sure the 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.)

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 L x W 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 disturbance

EHP Supporting Photographs

If Available:

- Labeled, ground-level, color photographs of the structure from each exterior side of the building/structure
  - Required if building/facility is more than 45 years old

- Technical drawings or site plans
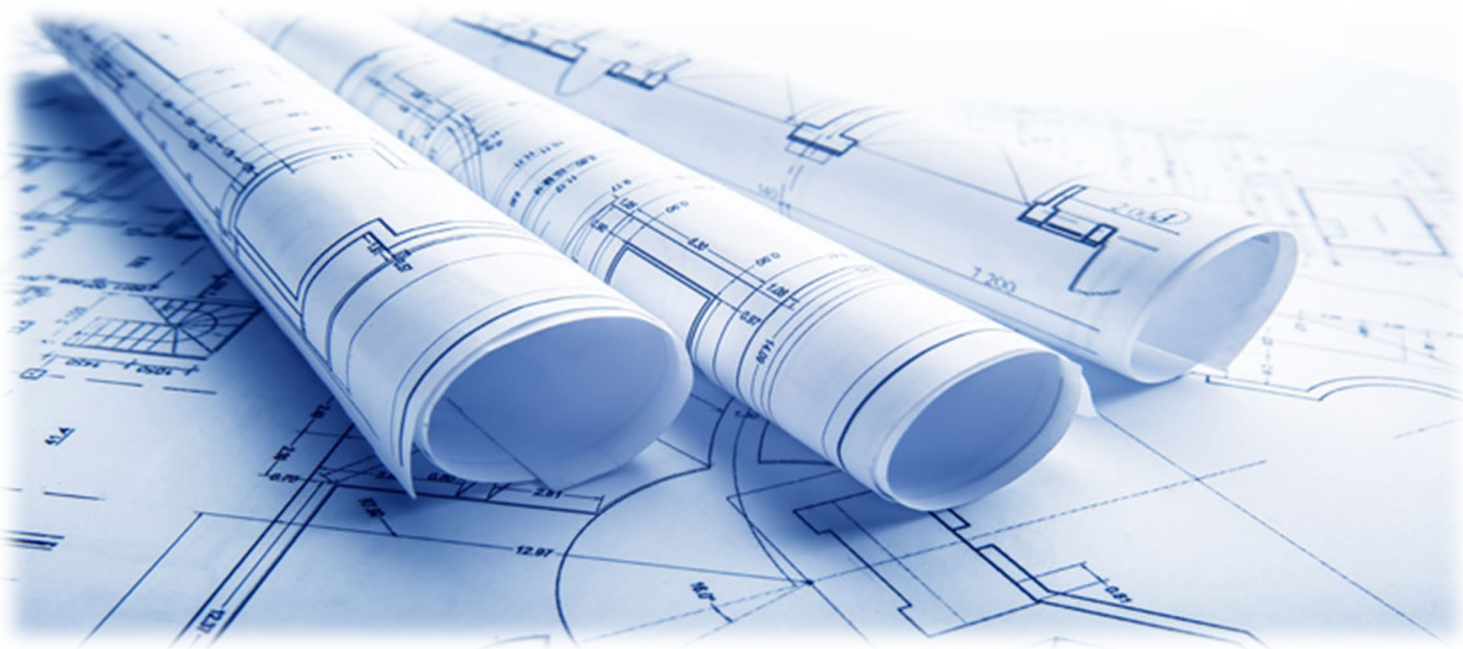
EHP Photographs Examples

- Aerial Photo

EHP Photographs Examples

- Clear and complete ground level photos with captions

North face

South face
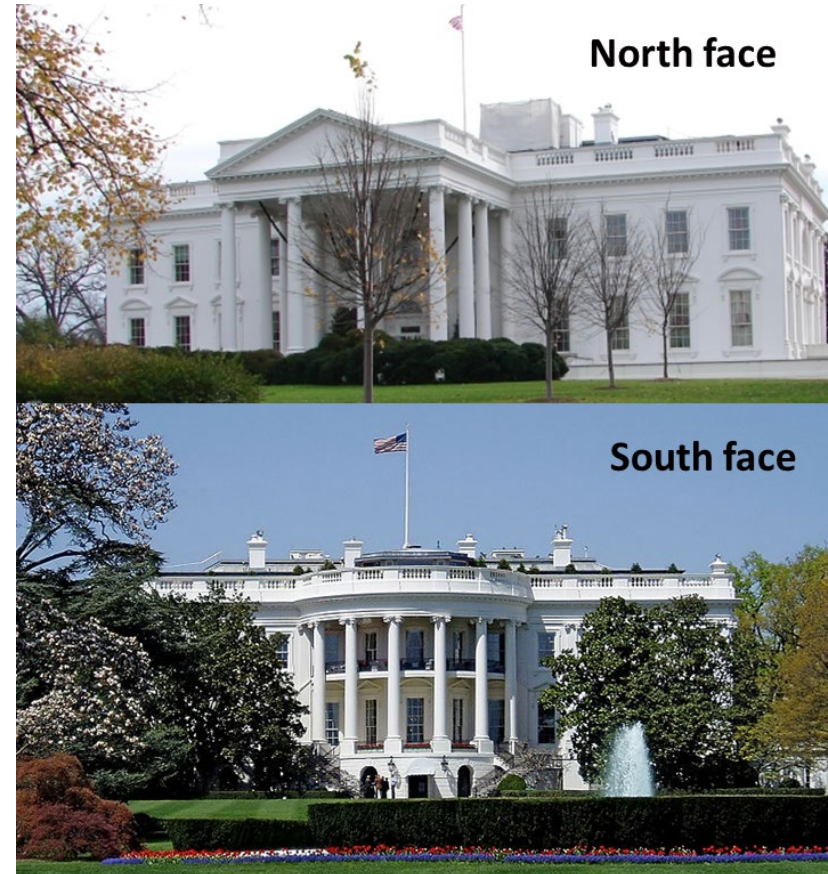
EHP Photographs Examples

- Captioned Installation Mockup Photos
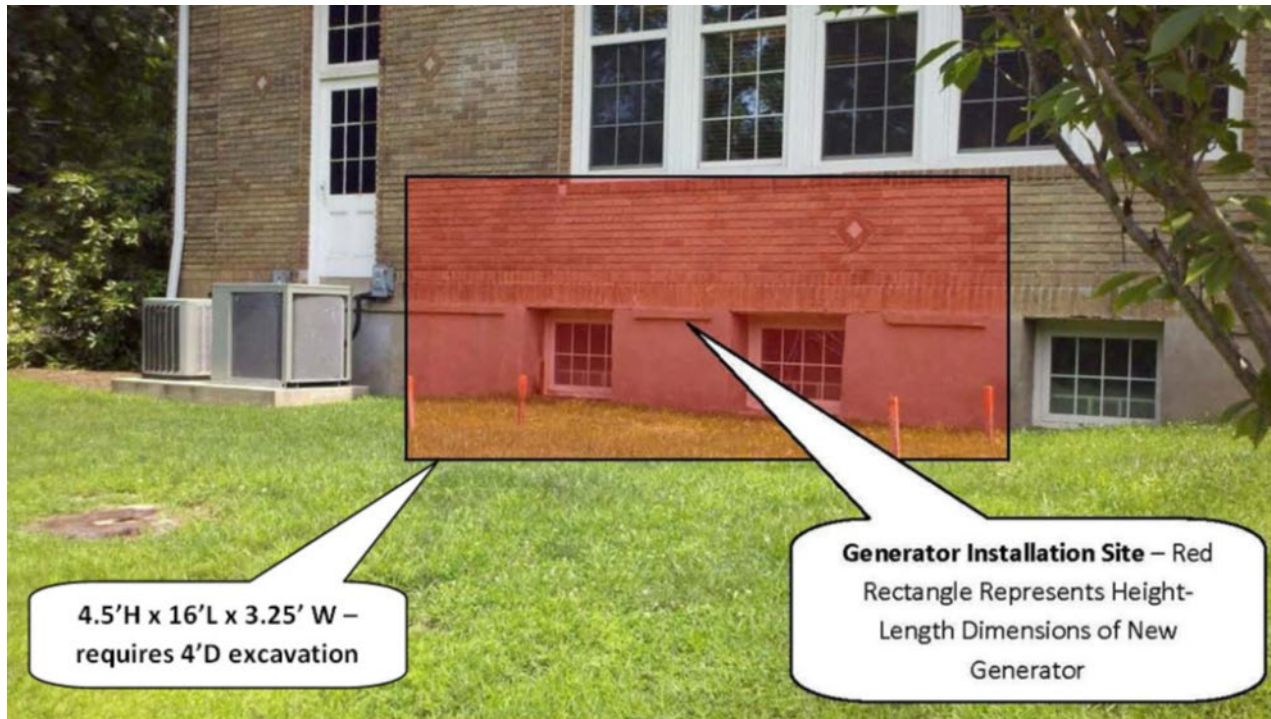
EHP Photographs Examples

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
- EHP must include each building/area that will be touched
- Submit forms via Correspondence Component in WebGrants
- Questions: Kristin Kayser, (573) 751-3438

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 must be available for use on other projects or incidents provided it will not interfere with the work on the project for which it was originally acquired

Equipment Tagging

- All equipment purchased with State Homeland Security Program funds MUST be tagged*

- All tags must state:

> Purchased with U.S. Department of Homeland Security Funds

*Tags are available upon request. Contact Maggie Glick at
Maggie.Glick@dps.mo.gov

Equipment Use

- Equipment must be used in the program or project it was acquired for as long as needed

- During the time that equipment is used on the project or program for which it was acquired, the non-Federal entity must make the equipment available for use on other projects or programs currently or previously supported by the Federal government, provided the use will not "interfere" with the work on the project or program for which it was originally acquired
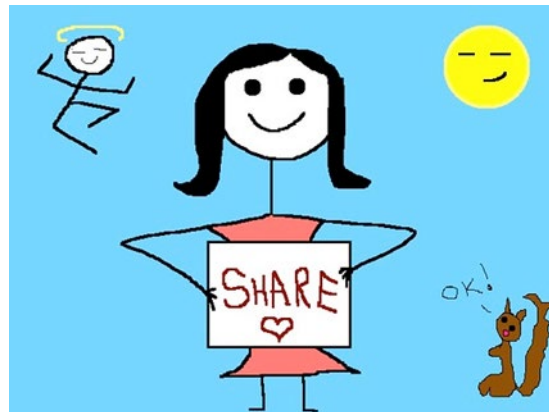
Equipment Use

- 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

- 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
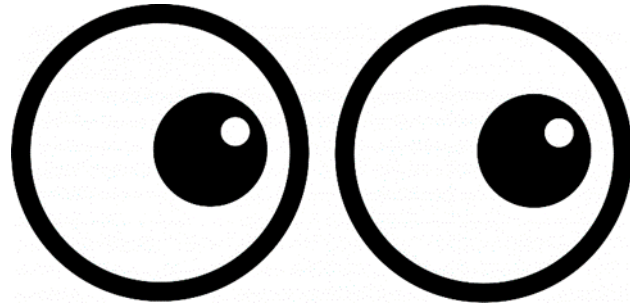
Inventory Management

- 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

- Equipment must be maintained to keep it in mission capable (operational) condition

Inventory Management

- 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

Inventory Form Examples

Correct:

Region	County	Fiscal Year	Grant Program	Grant Award Number	Description of Equipment	EGMS/WebGrants Line Item Number	Manufacturer	Model	Idenification 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@sgcso.com	(573) 883-5820

- All required fields completed
- One piece of equipment per line

Inventory Form Examples

Incorrect:

Region	County	Fiscal Year	Grant Program	Grant Award Number	Description of Equipment	EGMS/WebGrants Line Item Number	Manufacturer	Model	Idenification 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
B	Marion County	2018	SHSP		MT94 ChemBio, Front Zip, Tan, WL Gore Chem pak, Ultra Barrier Fabrick Certified, Size Large and X-Large		Lion	MT94 ChemBio		Hannibal Fire Department	2	$ 4,230.00	$ 4,230.00	100.00%	8/5/2019	2333 Palmyra Road, Hannibal, MO 63401	National	Mission Capable						

- Missing information
- Multiple items on one line

Inventory Management

- 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 due to OHS October 2024

Equipment Disposition

- When original or replacement equipment acquired with Homeland Security (HS) funds is no longer needed for the original project or program, the equipment may be retained, sold, or disposed of, 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

Equipment Disposition

- 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/documents/Equipment-Disposition-Request-Form-Regionalization_11-2-20.pdf

Equipment Disposition

- Equipment with a per item fair market value of less than $5,000 may be retained, sold, or disposed of, 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

- 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

Deployable Assets

- Homeland security funding should support deployable assets that can be used locally, regionally, across the State of Missouri, or the Nation, through automatic assistance and mutual aid agreements

- All assets supported in part or entirely with homeland security grant funding, MUST be readily deployable and NIMS kind and typed when possible. While it may not be physically deployable, GIS and interoperable communications systems are considered deployable assets

Resource Typing

- Resource Typing: Assigning a standardized typing designation to each resource ensures responders get the right personnel and equipment. To meet the Tier I criteria for national resource typing definitions, the resource must already exist as a defined, deployable interstate response resource

- Kind: Describes what the resource is (e.g., Medic, Firefighter, helicopter, bulldozer)

- Type: Describes the size, capability, and staffing qualifications of a specific kind of resource

- Website: https://rtlt.preptoolkit.fema.gov/Public
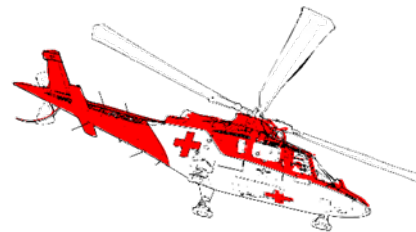
Type I Resources

- Tier I represents resources that are included in the national resource typing definitions, the resource must:
  - Already exist as a defined, deployable interstate response resource
  - Be exchanged and deployed with usage governed through interstate mutual aid agreements
  - Be of sufficient capability to warrant being allocated and/or physically deployed nationally
  - Have performance capability levels that can be defined as to category, kind and type

- Be identified, inventoried, and tracked to determine availability status for response operations by the jurisdiction having authority

- Allow for command and control utilization under NIMS ICS

- Be sufficiently interoperable or compatible to allow for deployment through a defined system for resource ordering as authorized under interstate mutual aid and assistance agreements

WebGrants

WebGrants Project Management

- Subrecipients with a multi-project grant will have each project set up individually in WebGrants

- Projects will be accessible under My Grants Component

- Each project will have a unique identifier to differentiate it from other projects
  - Subrecipient Grant Number
    - ((EMW-2022-SS-00094) – (XX)) – (XX)

Federal Grant Number

Subrecipient Identifier

Project Identifier

Project Management

- Budget will be set up by project

- Applications will be accessible with each project

- Claims, Subaward Adjustments, and Status Reports will be completed by project

- Projects must be closed as they are completed

- Grant final close out will be completed when all projects are closed
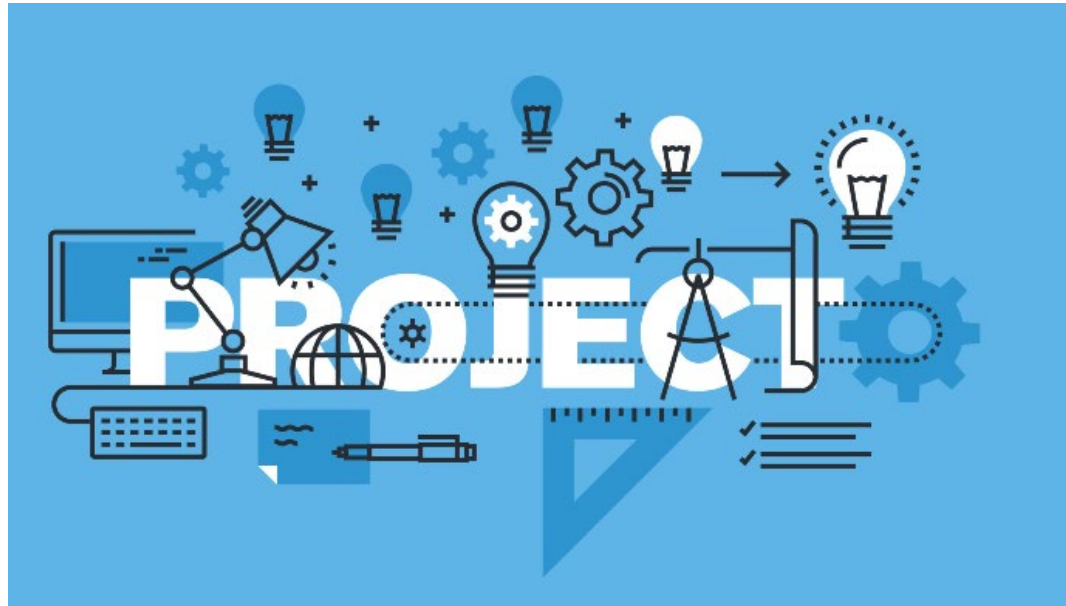
Using WebGrants

- Main Menu

- Select My Grants
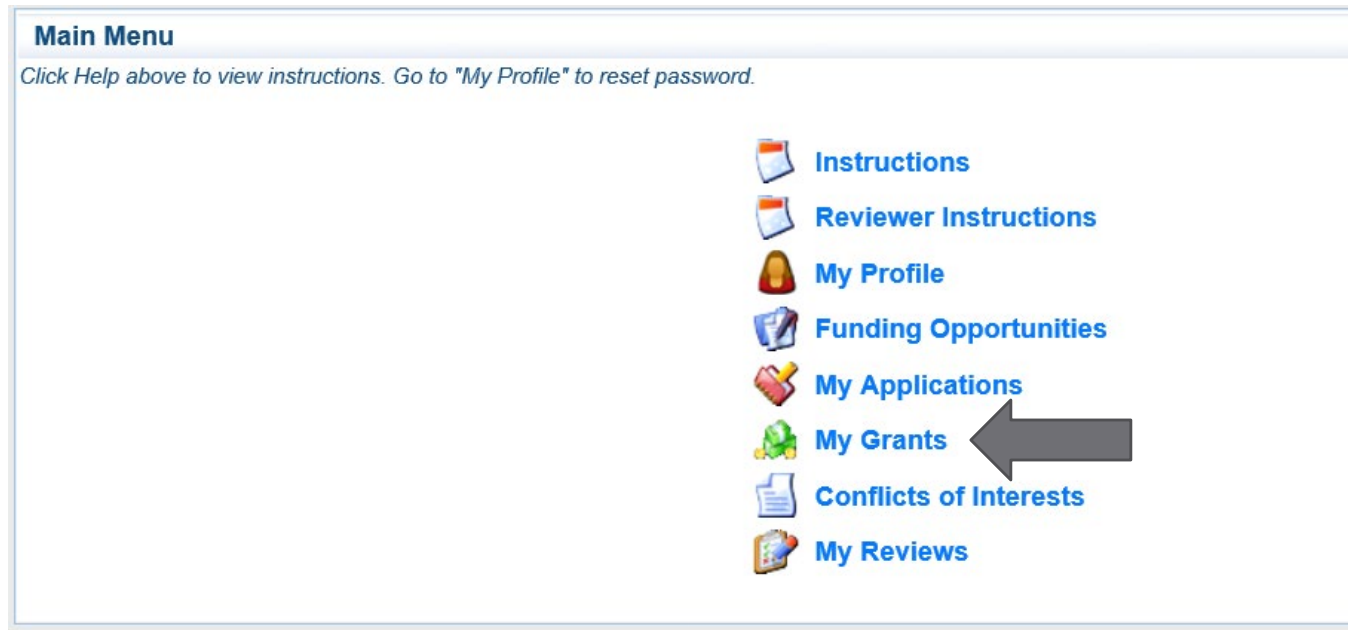
- This will display all open projects for your region

- There is a Closed Grants Component in the upper right hand corner after selecting My Grants

Using WebGrants

- Listing of all projects will show with projects titles showing in blue – click to open

Using WebGrants

- Once you open the project, you will see a listing of components to choose from

Instructions

The Grant forms appear below.

Grant Components

Component
General Information
Contact Information
Budget
Claims
Correspondence
Subaward Adjustments
Subaward Adjustment Notices
Status Reports
Attachments
SHSP Project Package
Subaward Documents - Final
Named Attachments
Closeout
Opportunity
Application

- Click on the component you wish to access

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 should 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

- 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 (if an exception is needed, let the Grant Specialist know)**
  - Incomplete claims will be negotiated for necessary corrections. Subrecipient must make the corrections and resubmit for approval and payment, prior to submitting the next claim.

- In the Claim Expenditure Form, a line must be completed for each individual expenditure
  - Multiple invoices on one expenditure line will not be accepted. However, each item purchased on an invoice does not need to be listed separately unless the items are on different lines in the approved budget.

Claims

- Expenditure Form
  - Incorrect = all salary on 1 line

Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
Expenditures						Create New Version | Go to Claim Forms | Add				
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 = each person has own salary line

Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
Expenditures						Create New Version | Go to Claim Forms | Add				
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

- Expenditure Form
  - Incorrect = multiple invoices claimed on 1 line

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 = separated invoices

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

- Reimbursement section:
  - Every budget line item from approved budget will show in this section whether you are entering any costs to it on this claim or not
  - Items/amounts listed in expenditures should match reimbursement section
  - Sometimes, if you save and have to go back to update the expenditure section, the reimbursement section may not update properly
    - Let OHS know if this happens and it will be fixed
  - Verify listings:
    - Budget Category: Budget category & budget line names under each
    - Details: Budget line item numbers
    - Subaward Budget: Amount on budget line
    - Expenses This Period: Expenditures requested on current claim
    - Prior Expenses: Total of previous claims expenses that were paid towards budget line
    - Total: Total of current and previous claims expenses
    - Available Balance: Total amount of funds remaining
      - Parenthesis indicate a negative budget line will result on the claim as entered
        - Will need to complete subaward adjustment to move funds to cover cost BEFORE claim is submitted

Claims

- <u>Equipment section</u>:
  - One equipment item per line
  - Fill in each item completely
    - <u>Requesting Organization:</u> Grant subrecipient
    - <u>Region:</u> Region A thru I
    - <u>County:</u> MO county grant subrecipient is in
    - <u>Year:</u> FY (fiscal year) of grant
    - <u>Budget Line #:</u> Must be expenditure line # from budget
    - <u>Manufacturer:</u> Company that made the item
    - <u>Model:</u> Type of item that distinguishes it from similar items [EX: SVR-P250M]
    - <u>Description:</u> Brief, but thorough description of item(s)
    - <u>Identification #(s):</u> Item's specific ID/Serial # [different from model #]
    - <u>Source of Funding:</u> Type of Grant [EX: SHSP]
    - <u>Title Holder:</u> Grant subrecipient
    - <u>Date of Delivery:</u> date items were delivered to grant subrecipient
    - <u>Quantity:</u> should be 1

Claims

- Equipment section continued:
  - Individual Item Costs: cost of each item
    - Cost should reflect overall total of item (including accessories) = what's listed in expenditure section for that item
  - % of Federal Participation in the cost: percentage total cost the grant paid for
    - Could cover 100% or less depending on total cost
    - **To find %:** divide the grant amount allowed for item by the total cost amount of item
  - Current Physical Location: address where the item is housed
  - Equipment Contact Person (ECP): Person responsible for equipment at subrecipient organization
  - ECP Phone #: responsible person's contact number
  - ECP Email Address: responsible person's email address
  - Use: where item will/can be used [upper levels cover lower levels, so just choose one]
    - National/Federal = can be used anywhere in contiguous U.S.
    - State = can be used anywhere in the state
    - Regional = can be used throughout region
    - Local = can only be used in local jurisdiction
  - Readiness Condition: working order vs. non-working order
    - Mission Capable = working order
    - Not Mission Capable = non-working order
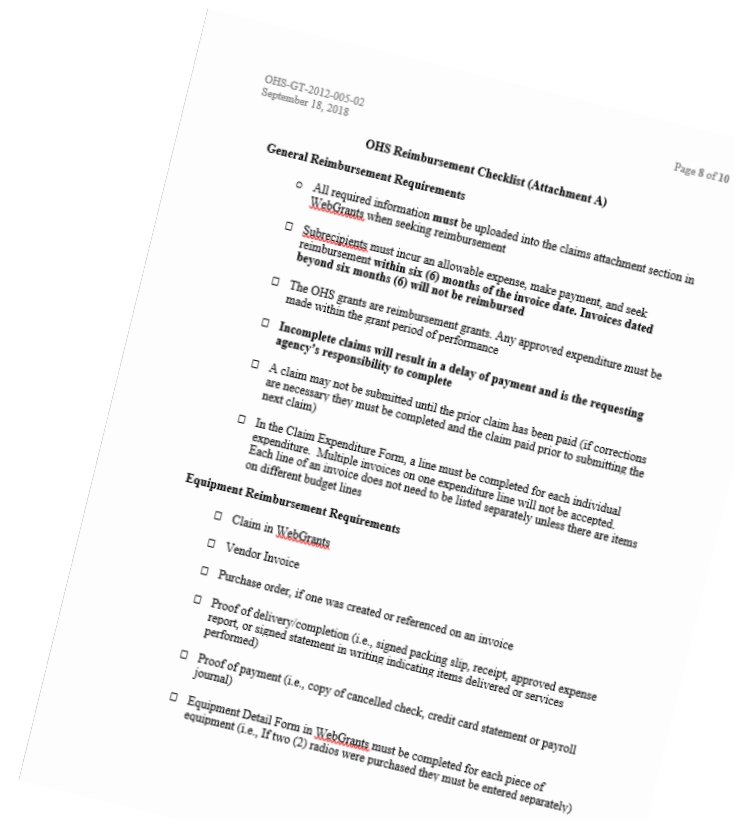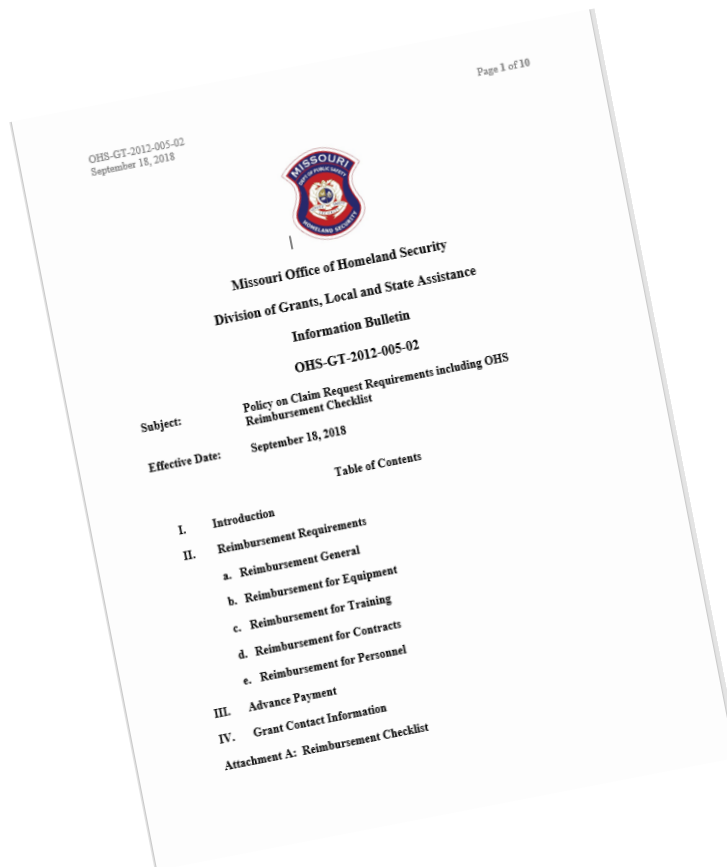
Claims

- Incorrect Equipment Detail

- Correct Equipment Detail

Claims

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

Final Claim

- Due 45 days after grant period of performance end – October 15, 2024

- Mark "Yes" for Final Report on claim General Information Form

Claim General Information

To create a new Claim enter the starting date and the ending date of the Report Period. This is the period of coverage for this Claim.

Claim Type:*   Monthly ▾

Claim Status:*   Editing ▾

Reporting Period:*   08/01/2024   🗓   08/31/2024   🗓 |
       From   To

Due Date: 🗓

Invoice Number:
State Agencies Only! Drop first 3 digits of number. Leave blank if there is not an invoice number!

Is This Your Final Report?*   ● Yes   ○ No

Common Claim Mistakes

- Entering an Invoice Number on the General Information component of the claim
  - This should be utilized for State Agencies **ONLY**

Common Claim Mistakes

- Entering more than one invoice per expenditure line
  - Each invoice should be entered as its own expenditure line

- Submitting a claim with insufficient funds on budget lines
  - The budget and available funds should be reviewed at the time of procurement to ensure there are available funds and there are no other necessary changes requiring completion of a subaward adjustment (i.e., quantity change)

- More than one piece of equipment listed per line in the Equipment Detail component of the claim
  - Only one piece of equipment should be listed per line.
    - For example, a claim for 4 mobile radios should have 4 entries to the Equipment Detail component (one for each radio)

- Missing proof of delivery
  - Please be sure to review the IB OHS-GT-2012-005 – Policy on Claim Request Requirements including OHS Reimbursement Checklist before submitting claims to ensure all documentation has been provided
  - IB OHS-GT-2012-005 contains a checklist to help verify you have all required documentation

Common Claim Mistakes

- Claiming expenses for M&A and WorkPlan to the wrong project
    - Allowable M&A Activities:
        - Submitting Subaward Agreements to subrecipients
        - Purchasing (purchase orders, ordering)
        - Submitting claims in WebGrants
        - Maintaining accurate budget through submission of Subaward Adjustments in WebGrants
        - Paying Vendors
        - Preparation and submission of grant status reports
        - Equipment inventory
        - Provide timely response to requests for information from OHS
        - Assures that all Federal/State requirements are being met
        - Develops a monitoring policy and procedure
        - Monitors subrecipients per agency policy and Federal/State Regulations
        - Serve as liaison between OHS and the agency subrecipients (locals)

Common Claim Mistakes

- <u>Allowable WorkPlan Activities</u>:
  - Participate in the development of Kind and Typing Tier 1 resources in region
  - Organize and facilitate a minimum of four quarterly RHSOC meetings
  - Organize and facilitate other RHSOC meetings as needed
  - Assist the RHSOC in the development of Homeland Security projects, inclusive of working groups
  - Prepare agendas, record meeting minutes, and maintain records for each RHSOC meeting
  - Assist RHSOC members with all HSGP grant application processes
  - Provide assistance to the OHS on data calls
  - Update regional THIRA plans consistent with the State guidelines and template
  - Assist local agencies with procurement (writing specifications and obtaining bids)
  - The RPC shall keep the general public and specific interest groups, such as elected officials and community leaders, informed about regional homeland security issues through the use of news releases, public presentations, radio programs, newsletters, and other media
  - Maintain updated RHSOC website

Status Reports

- Status Reports must be completed through WebGrants

- Due Dates
  - January 10 (Reporting Period: July 1 – December 31)
  - July 10 (Reporting Period: 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, but no later than October 15th [45 days after the Period of Performance (POP)]
  - Extensions would affect this final date and would be updated in the Status Report

Status Reports

- Milestones will continue to be used as a reporting mechanism in the Status Report

- OHS will provide the initial milestones
  - Subrecipient may request a change to milestones, if necessary
  - Please submit requests to change milestones to your Grant Specialist

- On the initial Status Report, for each project, subrecipients will be required to fill in the columns and provide the Estimated Date of Completion for all milestones
  - This should be a future date that allows for time to complete that milestone

- <u>All Status Reports must include</u>:
  - Updated estimated date of completion
    - Once milestone has been reached, update to show *actual* completion date
    - If milestone was marked as complete on previous status report this date **WILL NOT** change
  - Percentage of each milestone completed
    - If milestone was marked as complete on previous status report this date **WILL NOT** change
  - Milestone Progress notes
    - If milestone was marked as complete on previous status report this date **WILL NOT** change
  - Narrative project progress
    - What do you anticipate accomplishing over the next period
    - Do you have any project accomplishments to highlight
    - Are there any negative issues that should be noted

Status Reports

- Percent of milestone completed (10% increments)

% Milestone Completed	10% ▾
	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

Status Reports

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
  - All milestones need to be marked as final (<u>updated completion date </u>and marked as 100% completed)
  - The milestone that states "Project Final Report submitted and closed out" should have the completion date of the day you submitted the report

- Narrative Project Progress 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 of project accomplishments and impact on capability)
  - Please include the de-obligation amount in the Narrative Project Progress
    - EX: Project Complete. $0.00 de-obligated. **or** Project Complete. $26.42 de-obligated.

Final Status Report

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.	

Narrative Project Progress

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?
FY19 Region D Work Plan	Project complete. Final Report. $0.00 de-obligation.

Common Status Report Mistakes

- Estimated completion date that is in the past with a milestone that is not 100% complete
  - Estimated completion date should be updated with each status report, unless the milestone is complete
- Estimated completion date that is in the future with a milestone that is marked 100% complete
  - The estimated completion date should reflect the date the milestone is completed
- Narrative Project Progress not updated from the last status report
- REMEMBER: your progress report is for the report period listed on the Status Report
  - Make sure to keep that in mind as you fill out the information

Status Report Type: Semi-Annual

Report Period: 01/01/2021 06/30/2021
From   To

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

- Only one Subaward Adjustment may be submitted per quarter, per project
  - Discuss with Grant Specialist if an extenuating circumstance exists

- A Subaward Adjustment may not be submitted until the prior adjustment is in approved status

Subaward Adjustment

- Subaward Adjustments are required for:
  - Budget modifications
    - Updates to reflect budgeted vs. actual costs
  - 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
  - Refrain from making any purchases regarding the change until OHS approval is received

Subaward Adjustment

- Program Revision Subaward Adjustments include, but are 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)
    - Submit under the M&A of each open grant year
  - Change in Period of Performance (Extensions)
    - Period of Performance Extensions – extension is needed to finish project activities (purchasing of items/completion of training)
    - Closeout Extensions – extension is only needed to submit Final Claim/Status Report

- If both a Program Revision and Budget Revision are needed within the same Subaward Adjustment, select Budget Revision as the Type

Subaward Adjustment

- Budget Revision Subaward Adjustments should be completed if changes are needed to the project's budget

- Budget Revision Subaward Adjustments should include:
  - Justification for budget revision
    - Why are the budget changes necessary?
  - Details needed to make the budget change (review your budget to determine what information is needed)
    - New budget line items
      - AEL number, if applicable
      - Quantity
      - Justification for the requested item (instructions regarding justification requirements are located within the budget)

- Spreadsheet detailing changes to the budget
  - Spreadsheet must be copied & pasted into the justification <u>and</u> attached to the subaward adjustment
    - Single Project
    - Multiple Project

Subaward Adjustment

- Example: **Single** Project
  - Spreadsheet

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

- Justification in WebGrants

Justification*

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

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

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

Subaward Adjustment

- <u>Budget Form of Budget Subaward Adjustment:</u>
  - Make sure to match the current budget amounts with the correct budget category on the subaward adjustment
    - Complete ALL of the budget categories, not just the ones you are adjusting
  - Indirect Costs are not separate budget category – they are included in the supplies/operations category
  - Make sure to fill in the **Federal/State and Local Match Share** section
    - There is never a match in SHSP grants – this section stays $0.00

Subaward Adjustment

- Example of the budget section:

Budget

- The **Current Budget** column represents the total cost of the current subaward. Enter the total cost of each budget category as it is reflected in the current version of the Budget component. The sum of the Current Budget column should equal your current budget total.

- The **Revised Amount** column represents the requested, revised total cost of the budget as a result of the Subaward Adjustment. Therefore, enter the total cost of each budget category as it will be reflected in the revised version of the Budget component. The sum of the Revised Amount column should equal your revised budget total.

Row	Current Budget	Revised Amount
Personnel	$12,614.99	$12,614.99
Personnel Benefits	$4,916.38	$4,916.38
Personnel Overtime	$0.00	$0.00
Personnel Overtime Benefits	$0.00	$0.00
PRN Time	$0.00	$0.00
PRN Benefits	$0.00	$0.00
Volunteer Match	$0.00	$0.00
Travel/Training	$202.92	$72.92
Equipment	$0.00	$0.00
Supplies/Operations	$31.26	$161.26
Contractual	$0.00	$0.00
Renovation/Construction	$0.00	$0.00
Indirect Costs ← **IGNORE**	$0.00	$0.00

Federal/State and Local Match Share

- The **Current Budget** column represents the current subaward. Enter the total federal/state share and total local match share as it is reflected in the current version of the Budget component. The sum of the federal/state share and the local match share should equal the total of the Current Budget column above.

- The **Revised Amount** column represents the requested, revised total of the budget as a result of the Subaward Adjustment. Therefore, enter the total federal/state share and the total local match share as it will be reflected in the revised version of the Budget component. The sum of the federal/state share and the local match share should equal the total of the Revised Amount column above.

Row	Current Budget	Revised Amount
Total Federal/State Share	$17,765.55	$17,765.55
Total Local Match Share	$0.00	$0.00

Subaward Adjustment

- Example of completed budget section:

Budget

Row	Current Budget	Revised Amount	Net Change
Personnel	$12,614.99	$12,614.99	$0.00
Personnel Benefits	$4,916.38	$4,916.38	$0.00
Personnel Overtime	$0.00	$0.00	$0.00
Personnel Overtime Benefits	$0.00	$0.00	$0.00
PRN Time	$0.00	$0.00	$0.00
PRN Benefits	$0.00	$0.00	$0.00
Volunteer Match	$0.00	$0.00	$0.00
Travel/Training	$202.92	$72.92	($130.00)
Equipment	$0.00	$0.00	$0.00
Supplies/Operations	$31.26	$161.26	$130.00
Contractual	$0.00	$0.00	$0.00
Renovation/Construction	$0.00	$0.00	$0.00
Indirect Costs	$0.00	$0.00	$0.00
Totals	$17,765.55	$17,765.55	$0.00

Federal/State and Local Match Share

Row	Current Budget	Current Percent	Revised Amount	Revised Percent	Net Change
Total Federal/State Share	$17,765.55	100.0%	$17,765.55	100.0%	$0.00
Total Local Match Share	$0.00	0%	$0.00	0%	$0.00

Subaward Adjustment

- <u>Confirmation Form:</u>
  - This should be your executive director's information:
    - Authorized Official Name
    - Title
    - Date
  - The planner's or fiscal officer's name should not be used

- Do not complete anything in the **DPS Authorized Official/Designee Signature** section

- <u>Attachment Form:</u>
  - Add documentation separately and name accordingly
    - If budget revision: attach budget spreadsheet
    - If RHSOC vote was required: attach RHSOC meeting minutes showing vote
    - If quotes are required: attach

Regionalization Subaward Adjustment Requirements

- RHSOC must approve Subaward Adjustment changes prior to submitting the request in WebGrants
  - Exception: if the request is to move funds between existing budget lines within a project to account for budget vs. actual costs and does not, in any way, change the scope of the approved project

- Subaward Adjustments are due each quarter after each RHSOC meeting
  - Due Dates: May 31st, August 31st, November 30th, February 28th

- Documentation showing RHSOC approval (meeting minutes) must be attached to the Subaward Adjustment request

Regionalization Subaward Adjustment Requirements

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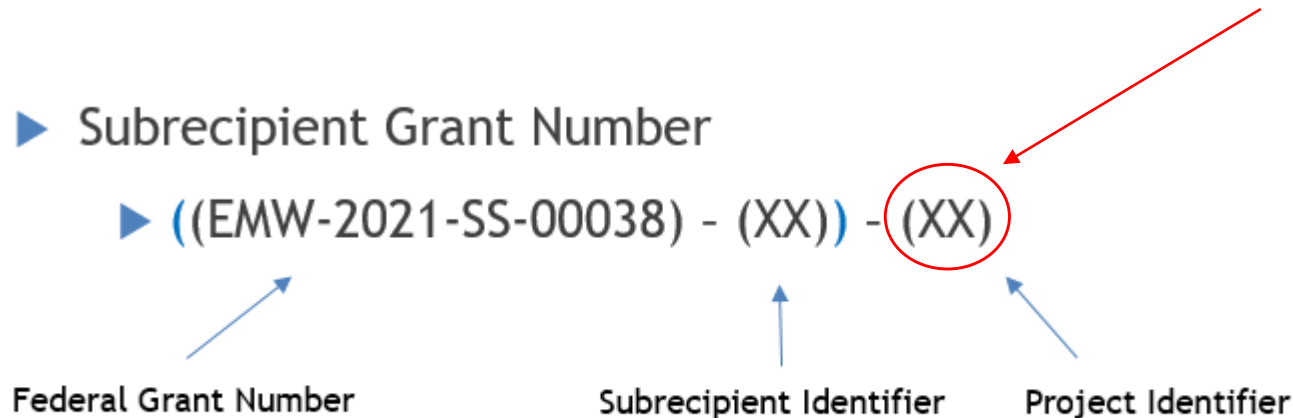 - Use Project Identifier to distinguish between projects

▶ Subrecipient Grant Number

 ▶ ((EMW-2021-SS-00038) – (XX)) – (XX)

Federal Grant Number   Subrecipient Identifier   Project Identifier

Regionalization Subaward Adjustment Requirements

- Example of **Multiple** Project Subaward Adjustment Request
  - Spreadsheet

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

Regionalization Subaward Adjustment Requirements

- Example: Justification

Justification*

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

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

Project #4 - Project Sample 2018

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

Project #8 - Project Sample 2018 A

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

Project #10 - Project Sample 2018 B

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

Please see budget revisions below:

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

Spending Plan

- A spending plan, for each open project, must be submitted to the OHS 180 days prior to the end of the grant period of performance
  - In February, OHS will send out an email with the spending plan template attached

- Spending plan must outline the status of the project and any planned or known changes to the project budget

- <u>Changes identified in the Spending Plan must be submitted through a Subaward Adjustment by June 2, approximately 90 days, prior to the end of the grant period of performance</u>

- Scope of work changes must be submitted 90 days prior to the end of the grant period

- Spending plan will be <u>submitted through the Correspondence Component in WebGrants</u> for **each project**
  - You will receive the approved spending plan from OHS through WebGrants Correspondence

What's the plan?

Correspondence Component

- All approval requests must be submitted through the Correspondence Component in WebGrants
  - Training/Exercise Requests
  - Single Feasible Source (SFS) Requests
  - Equipment Approvals (i.e. Generators)
  - EHP's
  - Contract Reviews
  - Spending Plans

- Approval for requests will be sent through this Correspondence component

- Correspondence is best used for all communications with OHS – easier to track
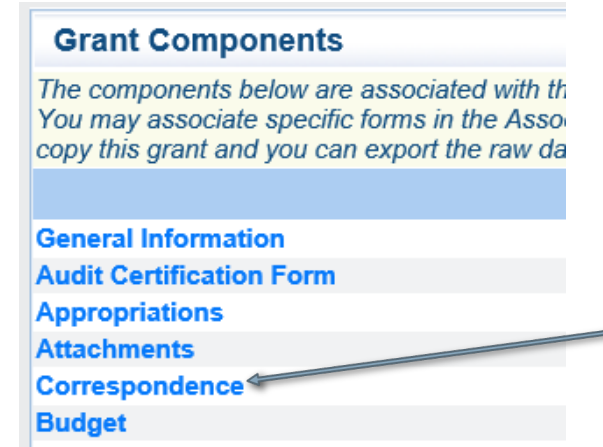
Correspondence Component

- Create a new Correspondence

Correspondence Component

- 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

Correspondence Component

- Your Grant Specialist will receive an email alert when you send correspondence through WebGrants
  - Correspondence is the only WG alert OHS receives

- When you receive correspondence, it will be sent to your email from dpswebgrants@dpsgrants.dps.mo.gov

- **<u>Use WebGrants to reply to Correspondence</u>**
  - *** 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

- Contract Reviews

- Single Feasible Source Requests

- Special Condition Approvals

- Equipment Approvals (Generators)

- EHP
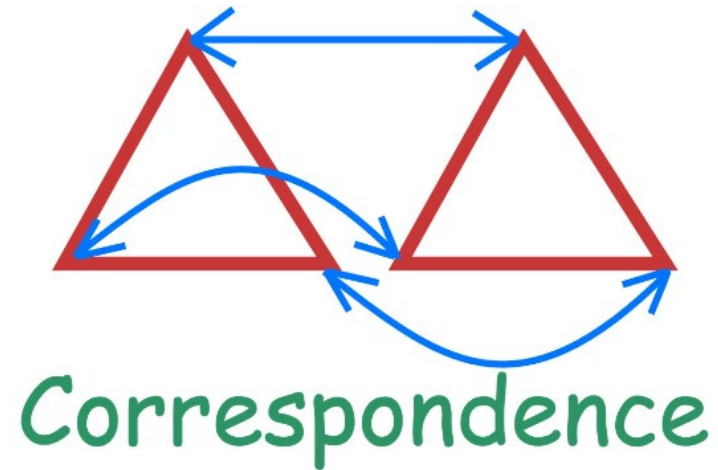
- Forms are available on our website
  https://dps.mo.gov/dir/programs/ohs/grantstraining/

Pass-Through Requirements

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

- 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 200.332 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 200.332(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 200.332 (a)

- The OHS maintains a subaward template for use

- If the pass-through entity chooses to utilize their own subaward template, it must be approved by the OHS prior to issuance

- <u>All</u> 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
  - It is the responsibility of the pass-through entity to thoroughly read and understand all conditions to maintain compliance

- **<u>Copies of signed subaward agreements are due to the OHS prior to the start of any project – submit via Attachments Component in WebGrants</u>**

Subaward Agreement Template Example

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 (i.e., project savings are moved to another project, funds are de-obligated)
    - Project period of performance changes (approved extensions)
- The RPC/COG needs to retain the GAN in their files

Denial Letters to Subrecipients

- Pass-through agencies are responsible for sending out denial letters to any agency whose application was reviewed and not funded by the RHSOC
    - Maintain copy of letters in grant file

Risk Assessments

- Risk assessment evaluates subrecipient risk of noncompliance to determine appropriate monitoring or additional special conditions

- 2 CFR 200.332 (b) discusses risk assessment requirements

- IB OHS-GT-2012-001- 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 discuss risk assessment requirements

Risk Assessments

- Must be completed by pass-through entities for each subrecipient before a subaward is issued
  - Assigned in WebGrants
  - Completion due by 11/15/2022

- 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 200.208 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 **<u>NOT</u>** an audit
  - OHS is **<u>NOT</u>** out to catch you doing something wrong – we are there to **<u>HELP</u>** you to correct areas of noncompliance to prevent audit findings
  - Chance to provide technical assistance and answer questions
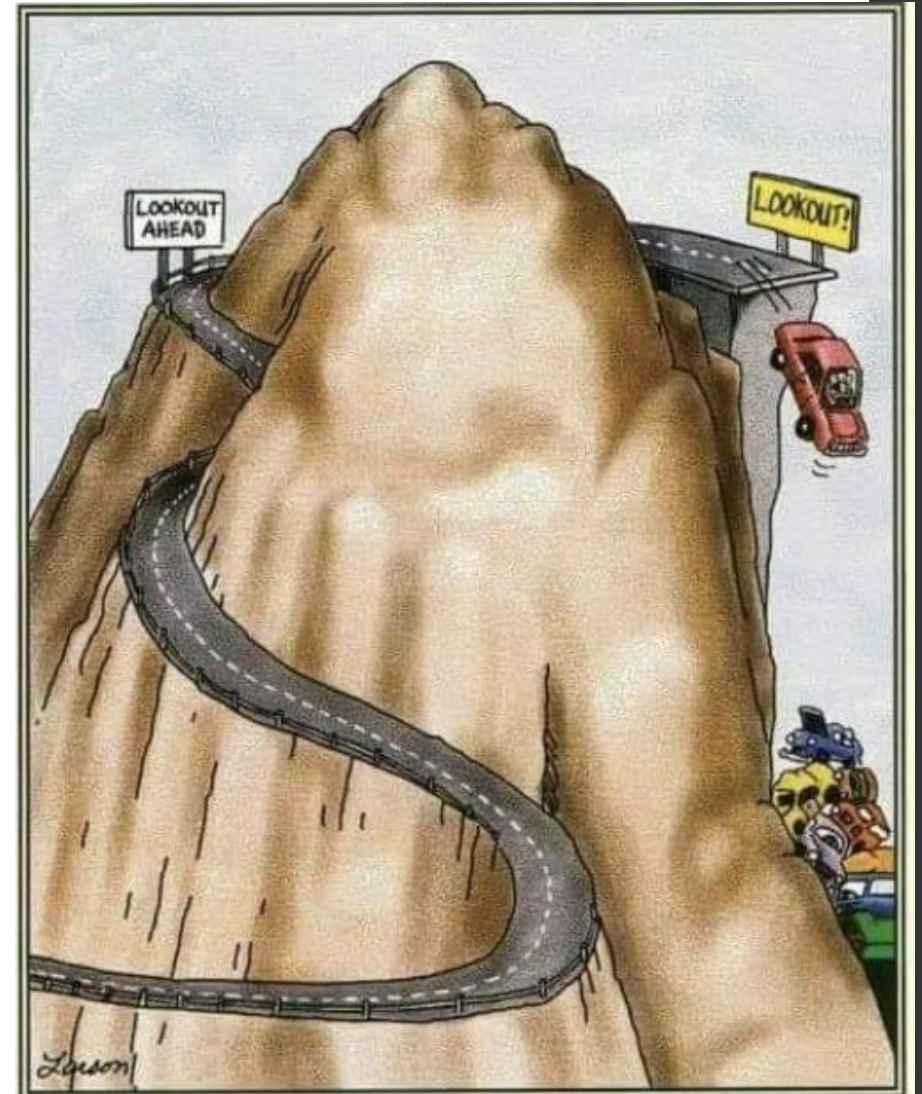
Subrecipient Monitoring

- Why do we have to monitor?
  - 2 CFR 200.329 (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 200.332 (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 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

- 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
  - 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

Minimum Pass-Through Monitoring Standards

- IB OHS-GT-2012-001- 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

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

Minimum Pass-Through Monitoring Standards

- 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

- 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

- Examples:
  - Pass-through entity has 20 subrecipients for the FY 2022 grant cycle
    - 10% of 20 subrecipients = 2 monitorings
    - 1 monitoring must be conducted on-site
  - Pass-through entity has 5 subrecipients for the FY 2022 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 that are 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 (uploaded in Attachments component of WebGrants)

- EHP
  - Not verifying if project requires EHP screening and obtaining clearance before project is started

- Procurement
  - Bid/quote requirements - **Remember you must follow the most restrictive policy**
  - Single Feasible Source approval

Common Areas of
Non-Compliance/Recommendations

- Advance Payment
  - Timeliness for providing proof of payment (30 days)

- Contracts
  - Not submitting via WebGrants Correspondence for approval before execution
  - Doesn't include required federal contract provisions
  - Contract not uploaded with claim in WebGrants

- Inventory
  - Adding more than one item per line to the equipment detail on claims
  - Missing information
  - Equipment items missing tags
  - Usage logs not containing all required information

Threat Hazard Identification and Risk Analysis (THIRA)

Regionally

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

- Whole Community Input Form (WCIF) due October 1st
  - Due tri-annually with the THIRA update OR
  - Due annually with the SPR update **only** if changes are requested

- Maintain an up-to-date THIRA via WCIF and SPR

- Organize, facilitate and participate in all meetings necessary to update the THIRA

- For assistance with the THIRA/SPR please contact Kevin Virgin
  kevin.virgin@dps.mo.gov (573) 526-9122

*RPC/COG are required to perform all of the above tasks as part of their Work Plan award, other subrecipients are required to provide data as needed to the RHSOC during the THIRA process

Important Dates

Signed Awards Due – November 15, 2022

NCSR Completed– December 31, 2022

Required EHP's - January 31, 2023

Status Reports - January 10th and July 10th

Spending Plan - March 4, 2024

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

Final Scope of Work Change Subaward Adjustment - June 2, 2024

Period of Performance - September 1, 2022 – August 31, 2024

Final Claim and Final Status Report – October 15, 2024

Questions?

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