FY 2020 State Homeland Security Program

Grant Award and Compliance Workshop

September 9, 2020

Agenda

- Welcome
- Grant Compliance
- Environmental Historical Preservation
- Inventory
- WebGrants
- Pass-Through Requirements
- Monitoring

Grant Requirements

Chelsey Call, Grants Specialist

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

- The Administrative Guide for Homeland Security Grants https://dps.mo.gov/dir/programs/ohs/grantstraining/
- Information Bulletins:
  - OHS-GT-2012-001 - Policy on Monitoring Subrecipient Reporting, Recordkeeping and Internal Operation and Accounting Control Systems
  - OHS-GT-2012-002 - Policy on Advance Payment & Cash Advances
  - OHS-GT-2012-003 - Policy on Funding Restrictions for Management and Administration Costs
  - OHS-GT-2012-004 - Policy on Food and/or Beverage Provided for Homeland Security Training/Exercise Sessions, Meetings, or Conferences

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

- OHS-GT-2012-005 - Policy on Claim Request Requirements Including OHS Reimbursement Checklist
- OHS-GT-2012-006 - Policy on Utilization of the Training Request Form for Approved and Non-Approved Training
- OHS-GT-2018-008 - Policy on Budget Modifications, Scope of Work Changes, and Spending Plans
- OHS-GT-2018-009 - Policy for Requirements of Subrecipient Pass-through Entities

- The Administrative Guide for Homeland Security Grants and IB's can be located on the Department of Public Safety (DPS) website https://dps.mo.gov/dir/programs/ohs/grantstraining/

Federal Grant Requirements

- Code of Federal Regulations 2 CFR Part 200 the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl
  - Regulations provide the foundational requirements for federal financial assistance
- Subrecipients are required to comply with the programmatic requirements of The U.S. Department of Homeland Security (DHS), Notice of Funding Opportunity (NOFO), Fiscal Year 2020 Homeland Security Grant Program (HSGP) https://www.fema.gov/homeland-security-grant-program
  - Provides programmatic requirements specific to the State Homeland Security Program (SHSP)
- Grant Programs Directorate (GPD) Information Bulletins (IBs) https://www.fema.gov/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 at the conclusion of the training
  - Original, signed, Subaward Agreement must be mailed to the OHS
    - **Due October 30, 2020**
- OHS will upload executed subaward agreements to WebGrants
  - Subrecipients may retrieve a copy of the executed subaward agreement from the Subaward Documents – Final section in WebGrants. A copy of the executed Subaward Agreement must be added to the subrecipient's grant file. *(Regionalization awards will be available under the Management and Administration Project)*

Subaward Documents - Final

Emergency Operations Plan

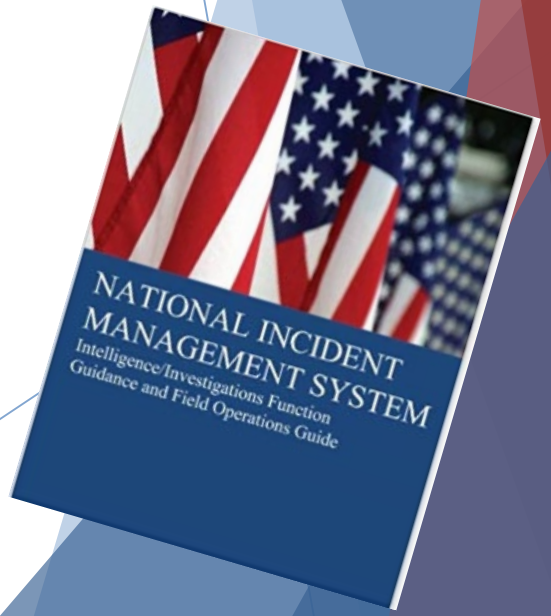
- All subrecipients that maintain an Emergency Operations Plan (EOP)
  - Must update EOP once every two years
  - Conform to guidelines outlined in CPG 101 v.2.0, developing and maintaining EOP
  - Subrecipients that are pass-through entities are required to monitor their subrecipients to verify EOP's are up to date
    - Maintain documentation showing this was verified (email, memo or copy of EOP)
  - If an EOP is not currently in place, you do not have to create one, but if there is an EOP in place, it must be updated

National Cybersecurity Review (NCSR)

- All recipients of FY20 Homeland Security Grant funds are required to complete the NCSR
  - Due December 15th 2020
  - **Failure to complete the review will result in loss of funding**
- If you are a pass-through entity, please gather all of your subrecipients completed NCSRs and send them to Chelsey Call via email in one attachment

National Incident Management System (NIMS)

- All subrecipients must strive to be NIMS compliant and adhere to the prescribed mandates and principles
- NIMS is a systematic, proactive approach to guide departments and agencies at all levels of government, nongovernmental organizations (NGO), and the private sector in working together seamlessly and managing incidents involving all threats and hazards—regardless of cause, size, location, or complexity—in order to reduce loss of life, loss of property, and harm to the environment. http://www.fema.gov/national-incident-management-system
- Regional Planning Commission (RPC)/Council of Governments (COG)
  - Executive Director and Project Director are required to complete IS 700 within 12 months of hire/appointment date, and send a copy of the Completion Certificate to your OHS Grant Specialist



Procurement Requirements

- With any expenditure, the subrecipient must ensure that:
  - The expenditure is an approved budget line item
    - Reimbursements will **NOT** 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 your Grant Specialist by October 30, 2020
  - 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

Updated State of Missouri Procurement Guidelines

- Items costing less than $10,000 may be purchased with prudence on the open market
- All purchases estimated to total between $10,000 but less than $100,000 to a single vendor, must be competitively bid, but need not be solicited by mail or advertisement. An informal method is acceptable, for example: request for quotation, telephone quotes, online pricing, etc.
- All purchases with an estimated total expenditure of $100,000 or over to a single vendor shall:
  - Be advertised for bid in at least two daily newspapers for general circulation in such places as are most likely to reach prospective bidders (and may advertise in at least 2 weekly minority newspapers and may provide such information through an electronic medium available to the general public) at least 5 consecutive days before bids for such purchases are to be opened
  - Post a notice of the proposed purchase in a public area of the subrecipient's office
  - Solicit bids by mail or other reasonable methods generally available to the public from prospective supplies
  - If less than 3 bids are received OHS must approve prior to vendor selection
- Use of single feasible source procurement of $10,000 or over requires prior approval from the OHS

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/

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

Single Feasible Source – Cont.

- Use of single feasible source procurement is discouraged. A single feasible source procurement exists when:
  - Non-Federal Funds
    - Supplies are proprietary and only available from the manufacturer or a single distributor; or
    - Based on past procurement experience, it is determined that only one (1) distributor services the region in which the supplies are needed; or
    - Supplies are available at a discount from a single distributor for a limited period of time
  - Federal Funds and Other Non-Federal Funds Used for Federal Match
    - The item is available only from a single source; or
    - The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; or
    - The Office of Homeland Security expressly authorizes noncompetitive proposals in response to a written request from the local agency; or
    - After solicitation of a number of sources, competition is determined inadequate

Who Are You Doing Business With?

- Subrecipients are required to verify that vendors used for grant purchases are not on either the Federal Excluded Parties List System (EPLS) or State Suspended/Debarred Vendors List
  - Federal System for Award Management https://sam.gov/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
  - Single Feasible Source over $10,000
  - Projects requiring an Environmental Planning and Historic Preservation (EHP)
  - Items that require a federal waiver can be located in the IB's, examples of some of these items:
    - Boats
    - Unmanned Aerial Vehicles
    - Explosives

Audit Requirements

- State and local units of government, institutions of higher education, and other nonprofit institutions, must comply with the organizational audit requirements of 2 CFR Part 200 Subpart F, Audit Requirements
  - Subrecipients who expend $750,000 or more of federal funds during their fiscal year are required to submit a single organization wide financial and compliance audit report (single audit) to the Federal Audit Clearinghouse within 9 months after the close of each fiscal year during the term of the award https://harvester.census.gov/facweb/
    - Expended funds include all Federal funds, not just Homeland Security funds

Projects Needing An EHP

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

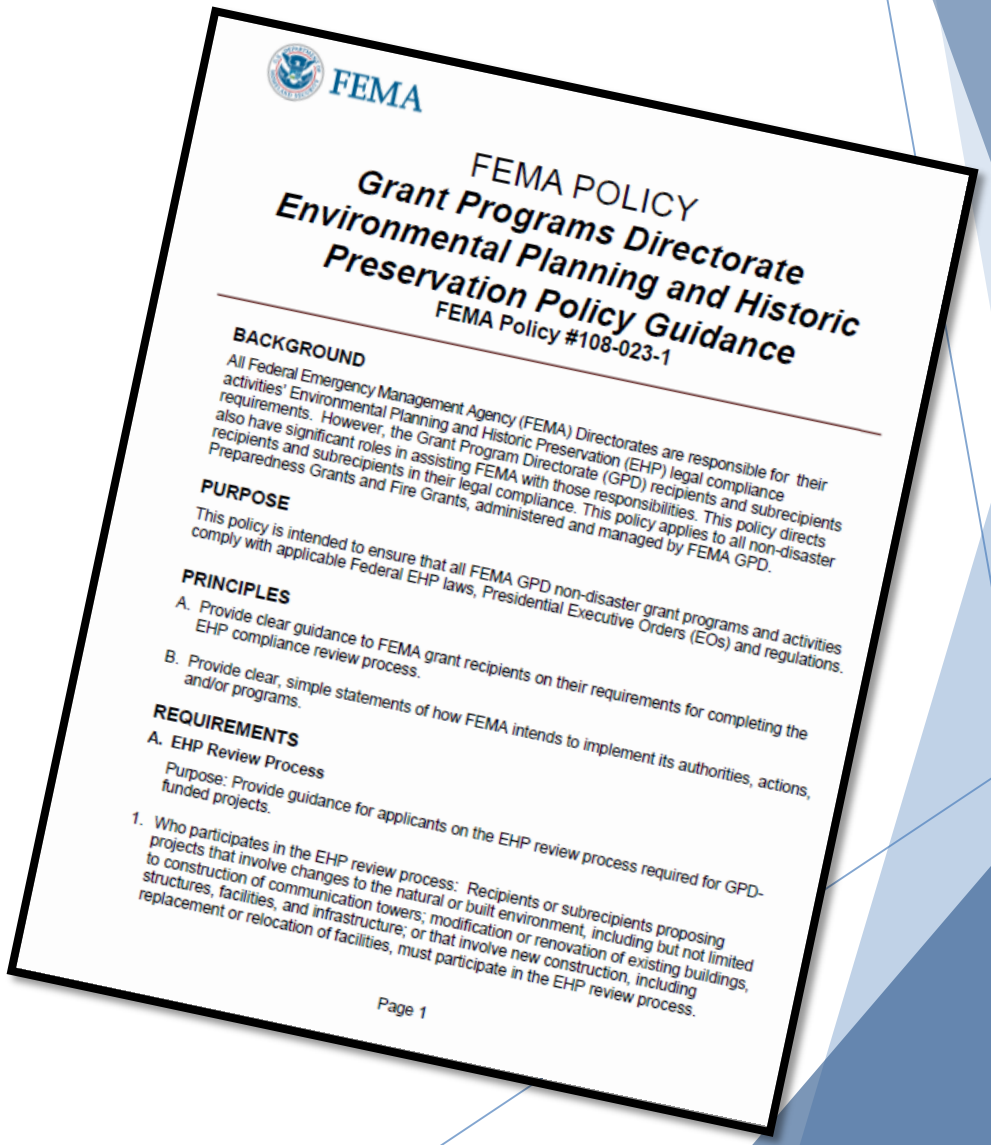
Projects that Trigger EHP Review – Cont.

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

NO RETROACTIVE APPROVALS

Policy Guidance August 15, 2018

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



FEMA

FEMA POLICY

Grant Programs Directorate
Environmental Planning and Historic Preservation Policy Guidance

FEMA Policy #108-023-1

BACKGROUND

All Federal Emergency Management Agency (FEMA) Directorates are responsible for their activities' Environmental Planning and Historic Preservation (EHP) legal compliance requirements. However, the Grant Program Directorate (GPD) recipients and subrecipients also have significant roles in assisting FEMA with those responsibilities. This policy directs recipients and subrecipients in their legal compliance. This policy applies to all non-disaster Preparedness Grants and Fire Grants, administered and managed by FEMA GPD.

PURPOSE

This policy is intended to ensure that all FEMA GPD non-disaster grant programs and activities comply with applicable Federal EHP laws, Presidential Executive Orders (EOs) and regulations.

PRINCIPLES

A. Provide clear guidance to FEMA grant recipients on their requirements for completing the EHP compliance review process.

B. Provide clear, simple statements of how FEMA intends to implement its authorities, actions, and/or programs.

REQUIREMENTS

A. EHP Review Process

Purpose: Provide guidance for applicants on the EHP review process required for GPD-funded projects.

1. Who participates in the EHP review process: Recipients or subrecipients proposing projects that involve changes to the natural or built environment, including but not limited to construction of communication towers; modification or renovation of existing buildings, structures, facilities, and infrastructure; or that involve new construction, including replacement or relocation of facilities, must participate in the EHP review process.

Page 1

EHP Timeframe – Cont.

- FEMA may be required to consult with the relevant State Historic Preservation Office (SHPO), the U.S. Fish and Wildlife Service (FWS), the U.S. Army Corps of Engineers (USACE), and others to determine impacts to sensitive resources

Please Note!

- Purpose of EHP review is to ensure compliance – **NOT** to deny or approve projects
- Costs of environmental review (e.g., archeological surveys, reports, etc.) are the responsibility of and paid by the grant subrecipient

EHP Packet

The EHP form can be located on the DPS website:

http://dps.mo.gov/dir/programs/ohs/documents/ohs-grant-application-forms/environmental_historical_protection_screening_form.docx

- Clear description of the project, including project location
- Labeled, ground-level photos of the project area
- Aerial photo(s)
- Includes the year built for any buildings/structures involved in the project
- Describes extent (length, width, depth) of any ground disturbance
- Includes any other pertinent EHP info (e.g., environmental studies/surveys, FCC info, permits in-hand, etc.)

Project Description Example

- Bad
  - Install cameras in courthouse
- Good
  - Install 4 Panasonic VT-5 video cameras on first floor of 1898 county courthouse. Cameras will be installed opposite exit doors, 2 feet below drop ceiling (see diagram for location, position, and height). Wiring will use existing conduits…, etc.

EHP Supporting Photographs

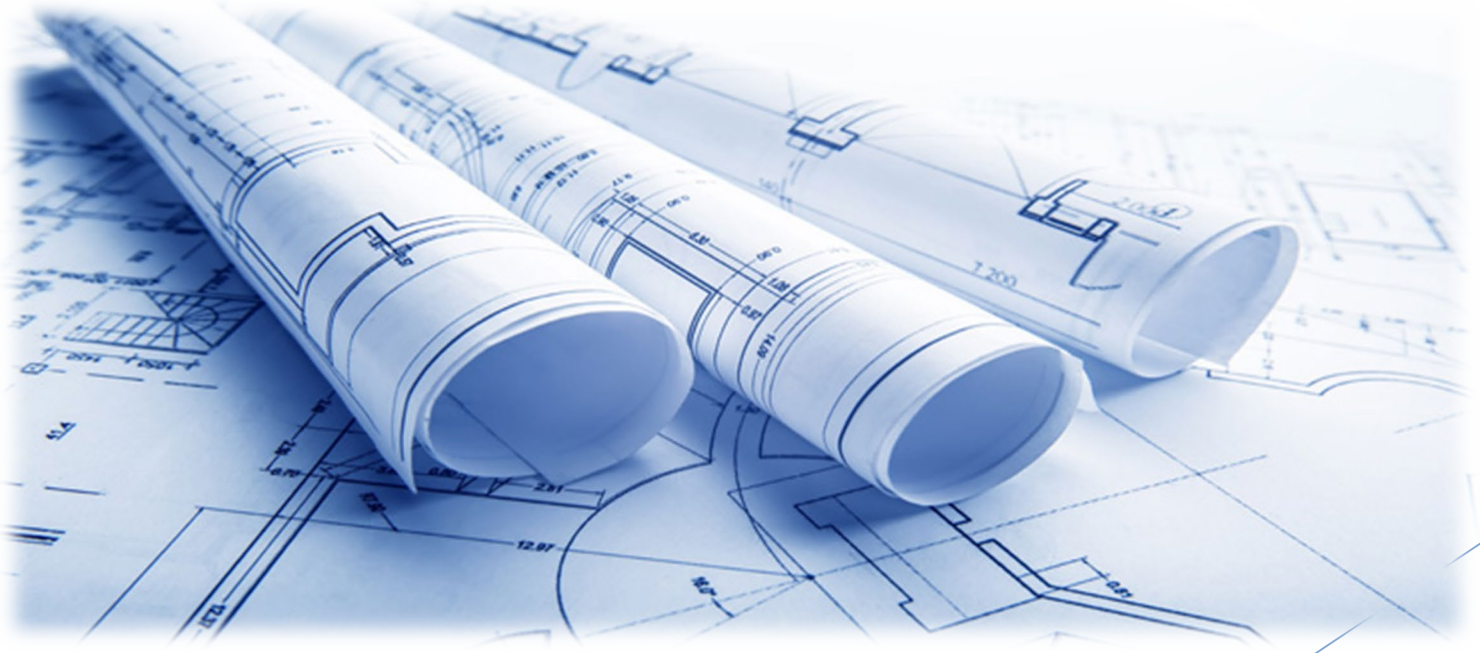
Required: site photographs, maps and drawings.

- Labeled, color, ground-level photographs of the project site
- Labeled, color photograph of each location where equipment would be attached to a building or structure (Interior and exterior)
- Label all photographs with the name of facility, location (city/county, state) and physical location (physical address or latitude-longitude)
- Identify ground disturbance. Adding graphics to a digital photograph is a means to illustrate the size, scope and location of ground disturbing activities
- Labeled, color aerial photograph of the project site

EHP Supporting Photographs – Cont.

If Available:

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



EHP Photographs Examples

Example Photographs

Aerial Photographs. The example in Figure 1 provides the name of the site, physical address and proposed location for installing new equipment. This example of a labeled aerial photograph provides good context of the surrounding area.

Figure 1. Example of labeled, color aerial photograph.

EHP Photographs Examples – Cont.

Ground-level photograph with excavation area close-up. The example in Figure 4 shows the proposed location for the concrete pad for a generator and the ground disturbance to connect the generator to the building's electrical service. This information can be illustrated with either an aerial or ground-level photograph, or both. This example has the name and physical address of the project site.

Figure 4. Ground-level photograph showing proposed ground disturbance area.

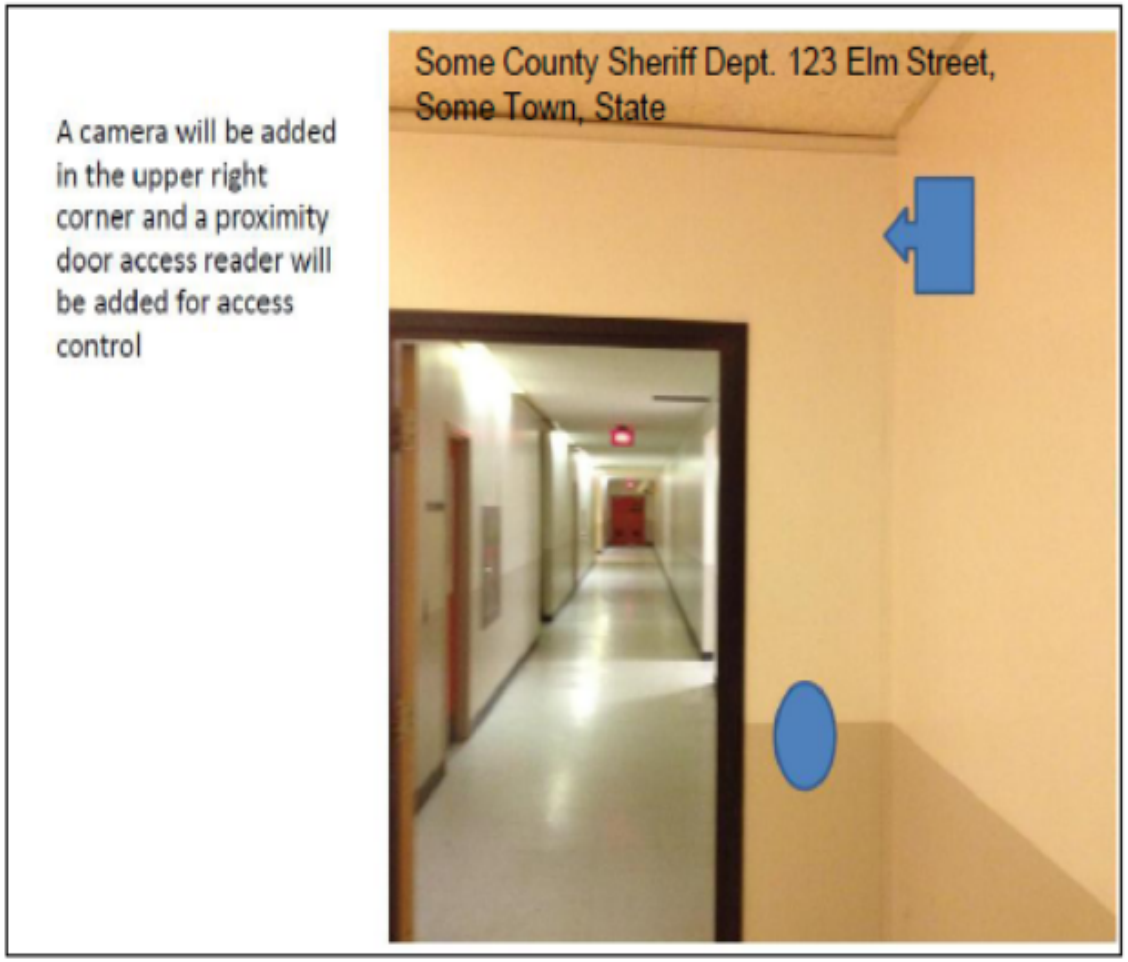
EHP Photographs Examples – Cont.

Ground-level photographs. The ground-level photograph in Figure 2 supplements the aerial photograph in Figure 1, above. Combined, they provide a clear understanding of the scope of the project. This photograph has the name and address of the project site, and uses graphics to illustrate where equipment will be installed.

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

EHP Photographs Examples – Cont.

Interior equipment photographs. The example in Figure 6 shows the use of graphic symbols to represent security features planned for a building. The same symbols are used in the other pictures where the same equipment would be installed at other locations in/on the building. This example includes the name of the facility and its physical address.



EHP Submission

The EHP packet must be completed and submitted early!!

Projects started before clearance is issued will NOT be reimbursed!

- If the project scope changes, another EHP form must be approved prior to work beginning
- Email forms to: Michelle.Branson@dps.mo.gov.
- Questions: Michelle Branson, (573) 526-9014

Inventory Compliance Training

Chelsey Call, Grants Specialist

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

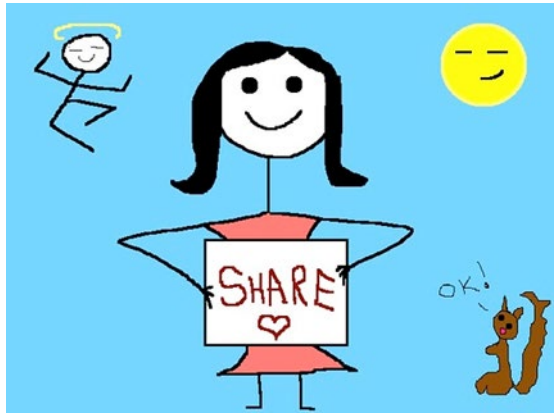
*Tags are available upon request. Contact Maggie Glick at Maggie.Glick@dps.mo.gov

How Can I Use My Equipment?

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



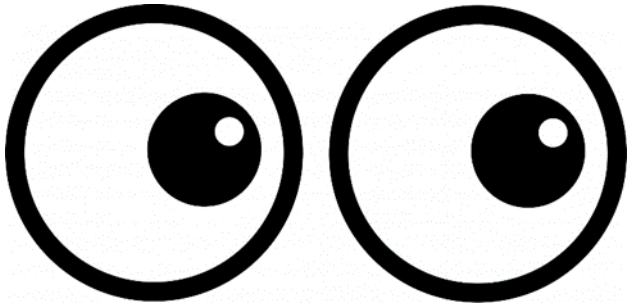
Equipment Use – Cont.

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

Inventory Management

Inventory Management

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



Inventory Management – Cont.

- Equipment must be protected against loss, damage and theft
  - Per 2 CFR 200.310: The non-Federal entity must, at a minimum, provide the equivalent insurance coverage for real property and equipment acquired or improved with Federal funds as provided to property owned by the non-Federal entity
- Investigate all incidents of loss, damage, theft, and report to the OHS within 30 days of the incident
- Equipment must be maintained to keep it in mission capable (operational) condition

Inventory Management - Cont.

- Equipment property records MUST be one item per line and include the following:

  - Region
  - County
  - Fiscal Year
  - Grant Program
  - Grant Award Number
  - Description of Equipment
  - 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

Inventory Form Examples – Cont.

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						

Inventory Management - Cont.

- New inventory will be added to OHS inventory at the time claims are approved

- Physical Inventory MUST be taken and results reconciled once every two years

  Next inventory due to OHS January 31, 2021

Equipment Disposition

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, 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 bi-annual physical inventory

Equipment Disposition – Cont.

- Subrecipients must request approval from the OHS prior to disposing of equipment. Procedures in the OHS Administrative Guide for Homeland Security Grants must be followed to request equipment disposition approval. Email the Equipment Disposition Forms to Maggie Glick at Maggie.Glick@dps.mo.gov
- A copy of the approved Equipment Disposition Form must be maintained in the subrecipient grant file
- Equipment Disposition Form can be located on the DPS website https://dps.mo.gov/dir/programs/ohs/grantstraining/
  - Equipment Disposition Form – Regionalization (Regions A-I)
  - Equipment Disposition Form – Other (LETPA, NSGP)

Equipment Disposition – Cont.

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

Equipment Disposition – Cont.

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

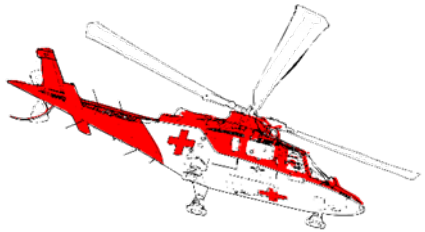
Example: Region X wants to sell their 2009 F150, which was 75% funded with Homeland Security funds and 25% funded with local funds. The fair market value for their 2009 F150 was $6,000.00. The Federal awarding agency would be entitled to $4,500.00 of the proceeds and the local agency would be entitled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



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

Tier I Resources – Cont.

- 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

Chelsey Call, Grants Specialist

WebGrants

- Project Management
- Status Reports
- Subaward Adjustments
- Claims
- Correspondence

WebGrants Project Management

- Subrecipients with a multi-project grant will have each project set up individually in WebGrants, the same as FY18 and FY19
- 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-2020-SS-00051) – (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

Status Reports

- Status Reports must be completed through WebGrants
- Due Dates
  - January 10 (July 1 – December 31)
  - July 10 (January 1 – June 30)
- Status Reports must be completed on a per project basis
- Final Status Reports must be completed for each project as they are completed

Status Reports – Cont.

- Milestones will 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 provide the Estimated Date of Completion for all milestones
- All Status Reports must include:
  - Updated estimated date of completion
  - Percentage of each milestone completed
  - Milestone Progress notes
  - Narrative project progress

Status Reports – Cont.

- Percent of milestone completed (10% increments)

- Milestone Progress is for notes specific to that milestone

Milestone:	Project Name:	Estimated Completion Date:	% Milestone Completed	Milestone Progress:
1. Determine specifications for needed equipment	SCBA Tank Replacement	09/18/2018	100%	Specifications completed

- Narrative Project Progress section should include:
  - Anticipated accomplishments in the next 6 months
  - Project accomplishments to be highlighted
  - Negative issues that need to be highlighted
    - This should include why any milestone estimated completion dates have changed from the previous Status Report

Status Reports - Cont.

Instructions

As per HSGP grant guidance, the Status Report is required to demonstrate the progress of your grant for the prior six month period. The OHS staff will report the information provided to the Regional Homeland Security Committee (RHSOC) and Homeland Security Advisory Committee (HSAC).

Milestone Progress Create New Version | Mark as Complete | Go to Status Report Forms | Add

Milestone:	Project Name:	Estimated Completion Date:	% Milestone Completed	Milestone Progress:
1. Determine specifications for needed equipment	SCBA Tank Replacement		0%	
2. Procurement Completed: bidding, vendor selection, and ordering of equipment	SCBA Tank Replacement		0%	
3. Equipment received, installed, tested and inventoried	SCBA Tank Replacement		0%	
4. Vendor paid and receipt of proof of payment received	SCBA Tank Replacement		0%	
5. WebGrants reimbursement completed with all necessary documentation	SCBA Tank Replacement		0%	
6. Equipment training completed	SCBA Tank Replacement		0%	
7. Local monitoring completed	SCBA Tank Replacement		0%	
8. Project closed out	SCBA Tank Replacement		0%	

Narrative Project Progress Add

Project Name:	What do you anticipate accomplishing in the project over the next six months? Do you have any project accomplishments to be highlighted? Are there any negative issues that need to be highlighted?
SCBA Tank Replacement Project	

Last Edited By: Michelle Branson, 09/19/2018

Final Status Report

- A final Status Report must be completed to close out a project
  - They do not say Final in the system
  - All milestones need to be marked as final (updated completion date and marked as 100% completed)
- 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 or project accomplishments, and impact on capability)
  - Please include the de-obligation amount in the Narrative Project Progress

Final Status Report – Cont.

Milestone Progress — Create New Version | Mark as Complete | Go to Status Report Forms | Add

Milestone:	Project Name:	Estimated Completion Date:	% Milestone Completed	Milestone Progress:
Example Milestone 1	Example	08/31/2019	100%	Complete
Example Milestone #2	Example	08/31/2019	100%	Complete

Narrative Project Progress — Add

Project Name:	What do you anticipate accomplishing in the project over the next six months? Do you have any project accomplishments to be highlighted? Are there any negative issues that need to be highlighted?
Example 1	Final Report - This project has been completed. Equipment (generator, vehicle, etc.) has been received is in working order and is being used for the purpose of the project.

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

Subaward Adjustments

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

Subaward Adjustment – Cont.

- 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

Subaward Adjustment – Cont.

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

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

Subaward Adjustment – Cont.

- 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
    - 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
  - Single Project
  - Multiple Project

Subaward Adjustment – Cont.

- Example
  - Spreadsheet

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

  - Justification in WebGrants

Justification*

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

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

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

Subaward Adjustment – Cont.

- Only one Subaward Adjustment may be submitted per quarter, per project
  - A waiver may be requested for extenuating circumstances
- A Subaward Adjustment may not be submitted until the prior adjustment is in approved status

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 must be attached to the Subaward Adjustment request

Regionalization Subaward Adjustment Requirements – Cont.

- 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-2018-SS-00044) - (XX)) - (XX)

Federal Grant Number | Subrecipient Identifier | Project Identifier

Regionalization Subaward Adjustment Requirements – Cont.

- Example
  - 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 – Cont.

- 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
- Spending plan must outline the status of the project and any planned or known changes to the project budget
- Changes identified in the Spending Plan must be submitted through a Subaward Adjustment by June 2, approximately 90 days, prior to the end of the grant period of performance
- Scope of work changes must be submitted 90 days prior to the end of the grant period
- Spending plan will be submitted thru the Correspondence Component in Webgrants

Claims

- OHS grants are reimbursement grants. Approved expenditures must be made within the grant period of performance
- Claims must be submitted through WebGrants to request reimbursement
- Supporting documentation must be submitted with each claim
  - IB OHS-GT-2012-005 - Policy on Claim Request Requirements Including OHS Reimbursement Checklist
- ***Supporting Documentation must be in one attachment in the same order as the Expenditure form***
- Incomplete claims will result in a delay of payment. It is the requesting agency's responsibility to complete the necessary changes
- Reimbursements require copies of cancelled checks

Claims – Cont.

- Claims must be submitted and paid one at a time. A **new claim must not be submitted until the prior claim is in paid status**
  - Incomplete claims will be negotiated for necessary corrections. Subrecipient must make the corrections and resubmit for approval and payment, prior to submitting the next claim
- In the Claim Expenditure Form, a line must be completed for each individual expenditure
  - Multiple invoices on one expenditure line will not be accepted. However, each item purchased on an invoice does not need to be listed separately unless the items are on different lines in the approved budget

Claims – Cont.

- Expenditure form
  - Incorrect

Expenditures Create New Version | Go to Claim Forms | Add

Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
1001	RPC/COG	M&A Personnel May - June (all staff)	1.0	$5,000.00	**$5,000.00**	$5,000.00	1	07/01/2018	Multiple	Multiple
						$5,000.00				

  - Correct

Expenditures Create New Version | Go to Claim Forms | Add

Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
1001	RPC/COG	Jane Smith May	1.0	$1,500.00	**$1,500.00**	$1,500.00	1	07/01/2018	123	05/30/2018
1001	RPC/COG	Jane Smith June	1.0	$1,500.00	**$1,500.00**	$1,500.00	3	06/30/2018	125	06/30/2018
1001	RPC/COG	Jack Jones May	1.0	$1,000.00	**$1,000.00**	$1,000.00	6	05/30/2018	124	05/30/2018
1001	RPC/COG	Jack Jones June	1.0	$1,000.00	**$1,000.00**	$1,000.00	7	06/30/2018	126	06/30/2018
						$5,000.00				

Claims – Cont.

- Expenditure Form
  - Incorrect

Expenditures Create New Version | Mark as Complete | Go to Claim Forms | Add

Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
10001	ACME Inc.	SCBA Tanks	10.0	$1,000.00	**$10,000.00**	$10,000.00	123/456	06/01/2018 and 07/03/2018	130	07/05/2018
						$10,000.00				

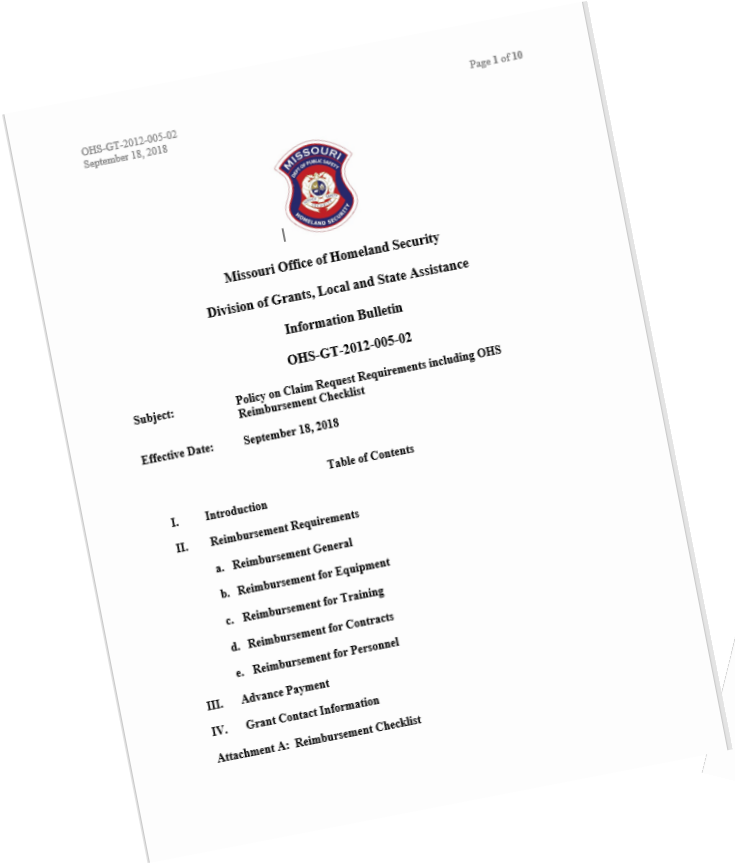
  - Correct

Expenditures Create New Version | Go to Claim Forms | Add

Line Number	Payee	Description	Quantity	Unit Cost	Expense Total	Federal Amount Requested	Invoice #	Invoice Date	Check/EFT Number	Check/EFT Date
10001	Acme Inc	SCBA Tanks	6.0	$1,000.00	**$6,000.00**	$6,000.00	456	7/3/18	130	7/5/18
10001	Acme Inc.	SCBA Tanks	4.0	$1,000.00	**$4,000.00**	$4,000.00	123	6/1/2018	130	07/05/2018
						$10,000.00				

Claims – Cont.

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



OHS-GT-2012-005-02
September 18, 2018

Missouri Office of Homeland Security

Division of Grants, Local and State Assistance

Information Bulletin

OHS-GT-2012-005-02

Subject: Policy on Claim Request Requirements including OHS Reimbursement Checklist

Effective Date: September 18, 2018

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a. Reimbursement General
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c. Reimbursement for Training
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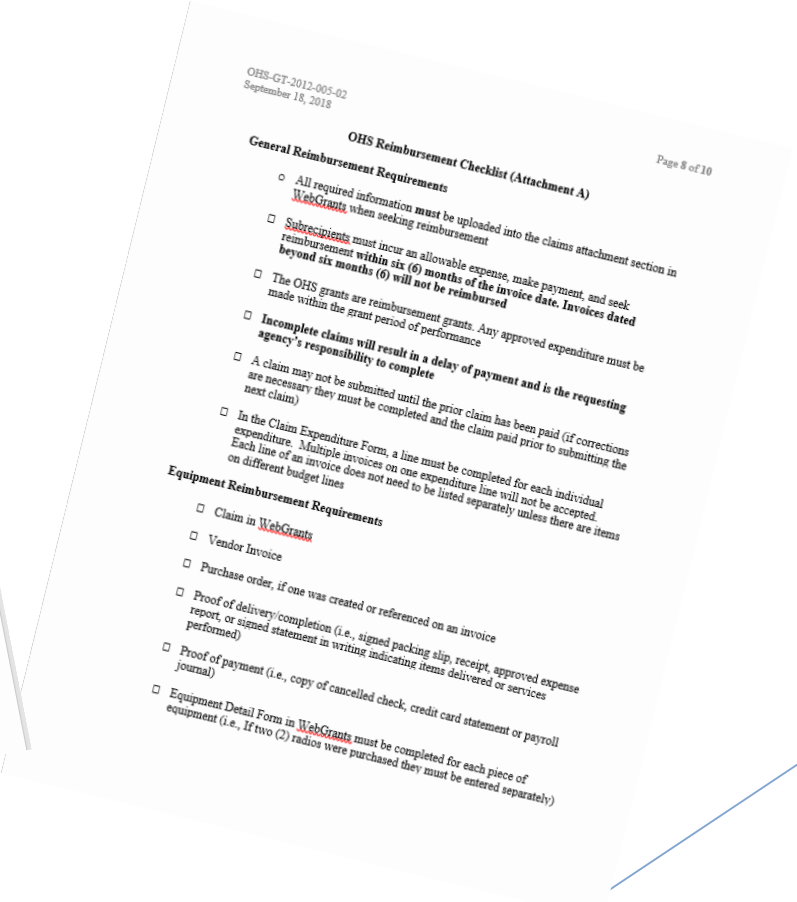
e. Reimbursement for Personnel
III. Advance Payment
IV. Grant Contact Information
Attachment A: Reimbursement Checklist



OHS Reimbursement Checklist (Attachment A)

General Reimbursement Requirements

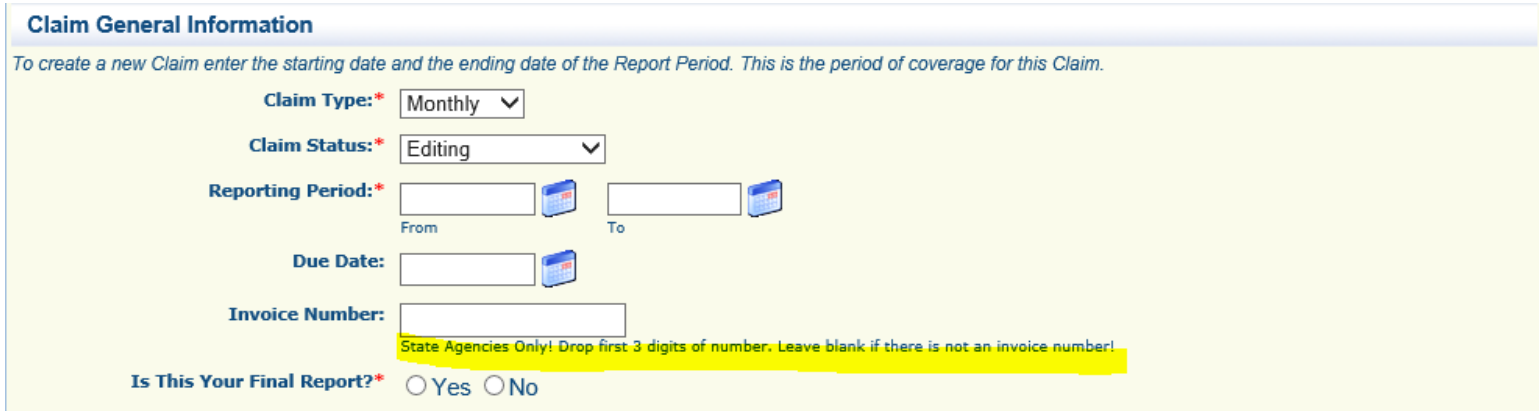
- All required information **must** be uploaded into the claims attachment section in WebGrants when seeking reimbursement
- ☐ Subrecipients must incur an allowable expense, make payment, and seek reimbursement **within six (6) months of the invoice date. Invoices dated beyond six months (6) will not be reimbursed**
- ☐ The OHS grants are reimbursement grants. Any approved expenditure must be made within the grant period of performance
- ☐ **Incomplete claims will result in a delay of payment and is the requesting agency's responsibility to complete**
- ☐ A claim may not be submitted until the prior claim has been paid (if corrections are necessary they must be completed and the claim paid 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. Each line of an invoice does not need to be listed separately unless there are items on different budget lines

Equipment Reimbursement Requirements

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

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 – Cont.

- 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 - Cont.

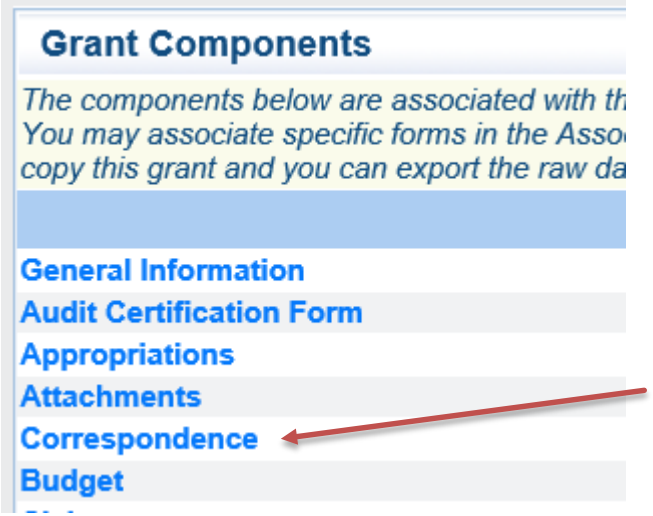
- Claiming expenses for M&A and WorkPlan to the wrong project
  - Allowable M&A Activities
    - Submitting Subaward Agreements to subrecipients
    - Purchasing (purchase orders, ordering)
    - Submitting claims in WebGrants
    - Maintaining accurate budget through submission of Subaward Adjustments 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 – Cont.

- Allowable Work Plan Activities
  - 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
  - Updated 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

Correspondence Component

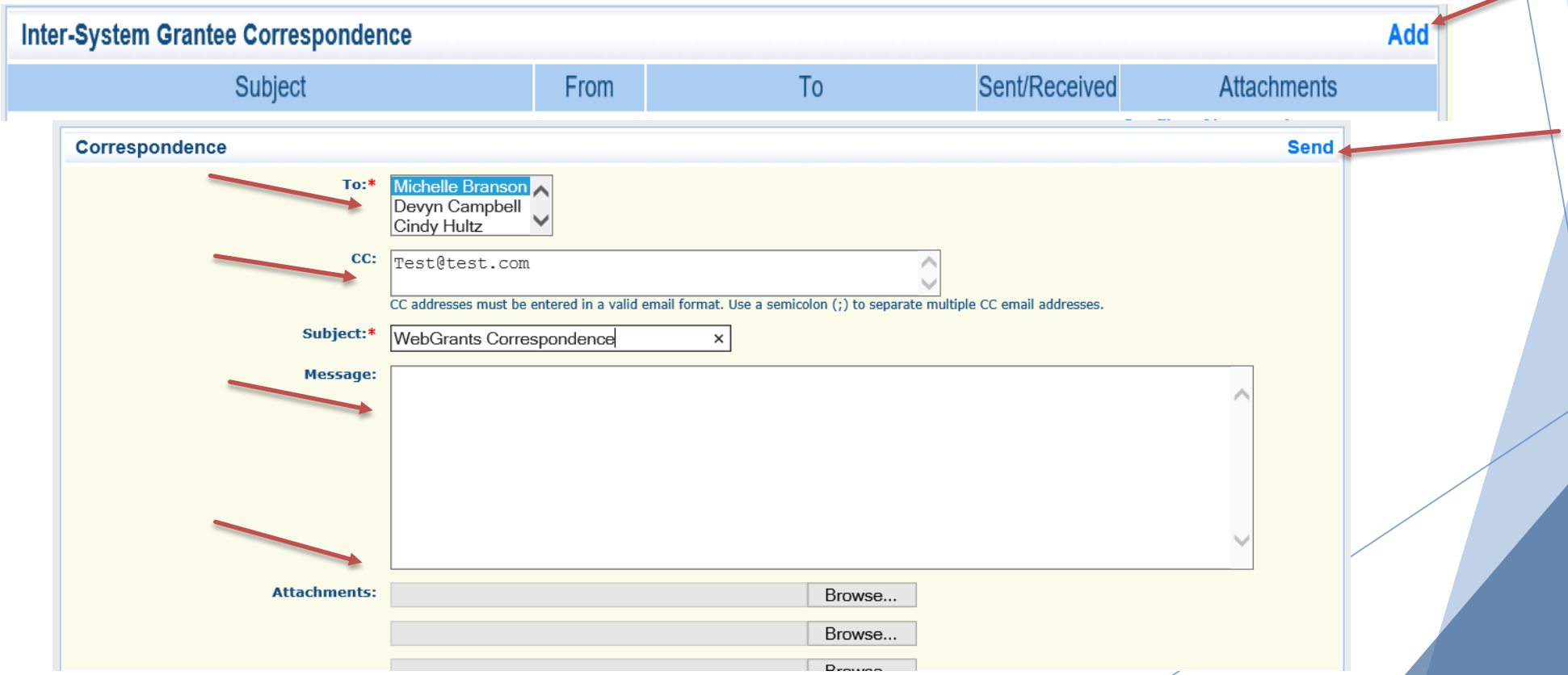
- All approval requests must be submitted through the Correspondence Component in WebGrants
  - Training Requests
  - Single Feasible Source (SFS) Requests
  - Equipment Approvals (i.e. Generators)
  - EHP's
  - Contract Reviews
  - Spending Plan



- Approval for requests will be sent through this component

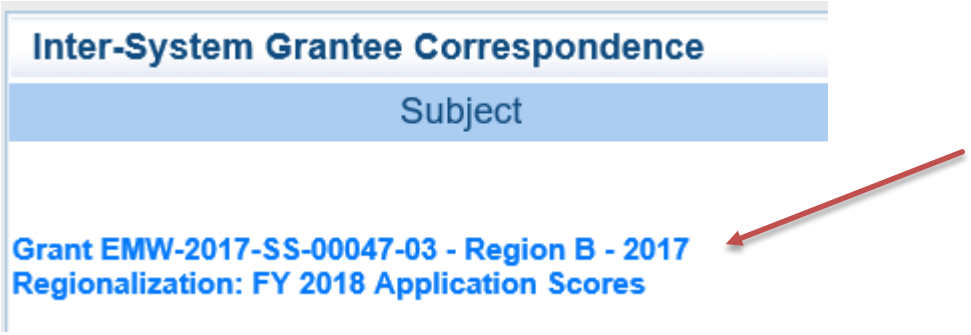
Correspondence Component – Cont.

- Create a new Correspondence

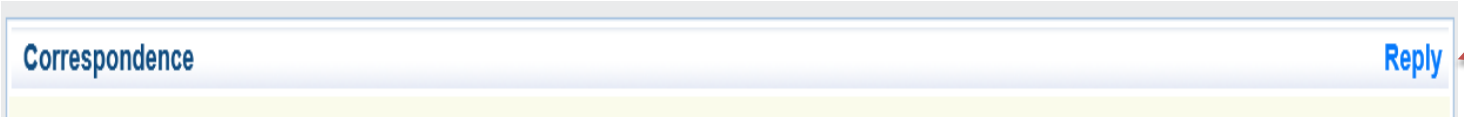


Correspondence Component – Cont.

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



  - In the open correspondence select Reply



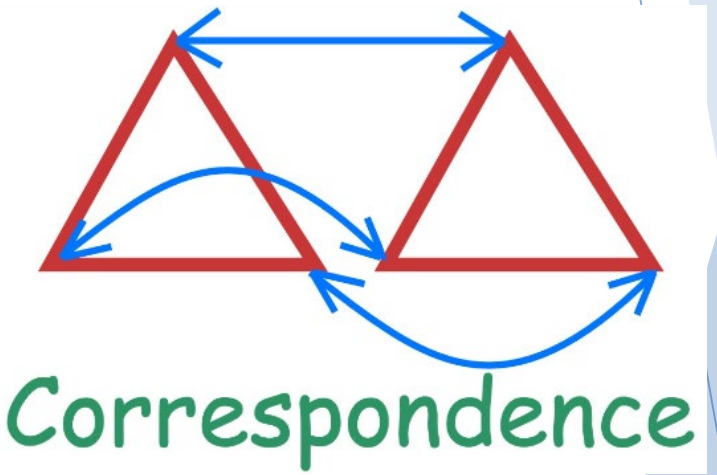
Correspondence Component – Cont.

- Your Grant Specialist will receive an email alert when you send correspondence through WebGrants
- When you receive correspondence, it will be sent to your email from dpswebgrants@dpsgrants.dps.mo.gov
- Use WebGrants to reply to Correspondence
  - *** DO NOT 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 (Updated form)
- Special Condition Approvals
- Equipment Approvals (Generators, EHP's)

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



Pass-Through Entities and Monitoring

Chelsey Call, Grants Specialist

Pass-Through Entities

- 2 CFR 200.74 defines a pass-through entity as a “non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.”
- 2 CFR 200.92 defines a subaward as an “award provided by a pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract”

Who is a Pass-Through Entity?

- The Missouri Department of Public Safety, Office of Homeland Security, is a pass-through entity as subawards are issued to all RPC/COGs, LETPA subrecipients, and NSGP subrecipients
- Your agency is a pass-through entity if it receives a subaward from the OHS and subsequently passes funds, personnel costs, equipment, supplies, etc., to another entity

Pass-Through Entity Requirements

- 2 CFR 200.331 discusses pass-through entity requirements, which are listed below:
  - Risk Assessment
  - Subaward
  - Monitoring
- The OHS has released IB OHS-GT-2018-009 - Policy for Requirements of Subrecipient Pass-Through Entities for reference to the requirements listed above

Subawards

- Pass-through entities are required to issue subawards as detailed in 2 CFR 200.331(a)
- IB OHS-GT-2018-009 - Policy for Requirements of Subrecipient Pass-Through Entities also discusses subaward requirements
- Certain elements are required to be detailed in the subaward as discussed in 2 CFR 200.331 (a)
- The OHS maintains a subaward template that is available for use
- If the pass-through entity chooses to utilize their own subaward template, it must be approved by the OHS prior to issuance
- **All** Articles of Agreement in the subaward, issued to the pass-through entity, by the OHS, must be passed through to their subrecipient via the subward
- **Copies of signed subaward agreements are due to the OHS prior to the start of any project**

Subaward Modifications

- The OHS maintains a Grant Adjustment Notice (GAN) template that can be utilized for subaward modifications
- If any of the elements of the subaward change throughout the period of performance, a subaward modification or adjustment must be completed to update the subaward
  - For example:
    - Amount of award changes (i.e., project savings are moved to another project, funds are de-obligated)
    - Project period of performance changes (approved extensions)

Risk Assessments

- Risk assessment evaluates subrecipient risk of noncompliance to determine appropriate monitoring or additional special conditions
- 2 CFR 200.331 (b) discusses risk assessment requirements
- IB OHS-GT-2012-001- Policy on Monitoring Subrecipient Reporting, Recordkeeping, and Internal Operation and Accounting Control Systems & IB OHS-GT-2018-009 - Policy for Requirements of Subrecipient Pass-Through Entities also discusses risk assessment requirements

Risk Assessments - Cont.

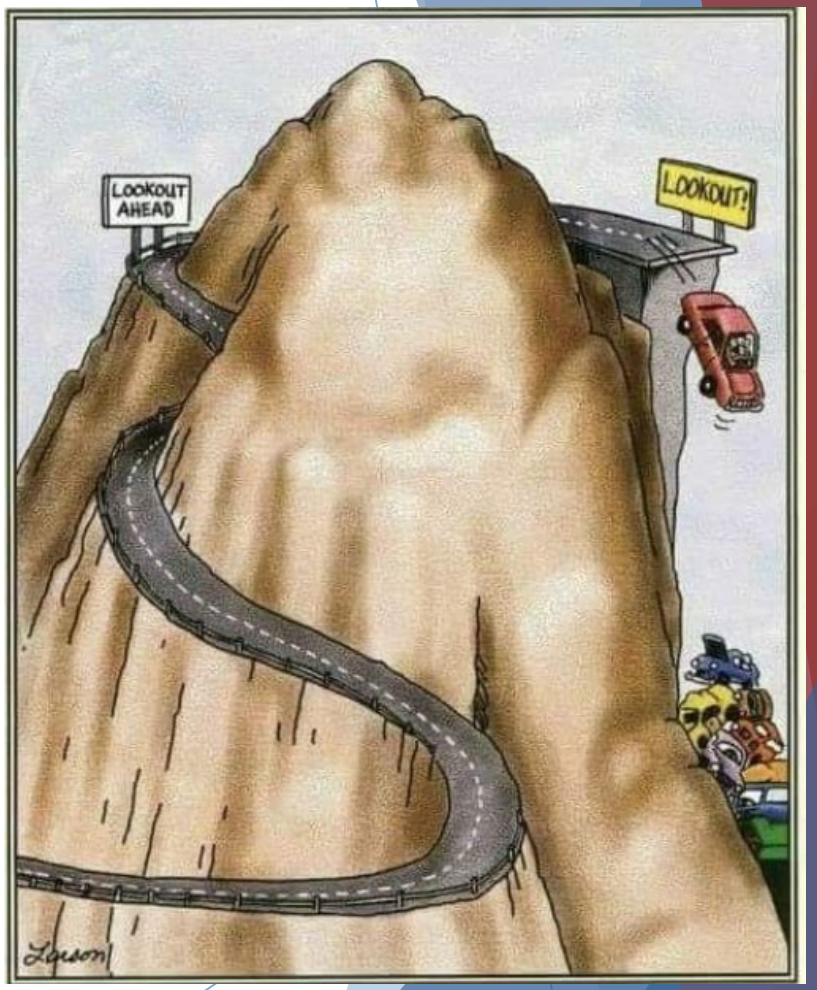
- Must be completed by pass-through entities for each subrecipient before a subaward is issued
  - Assigned in WebGrants
  - Completion due by 10/15/2020
- Evaluation of risk may include factors such as:
  - Prior experience
  - Previous audit conclusions
  - New personnel or new/changed time/accounting systems
  - Federal monitoring conclusions
  - Other

Risk Assessment Results

- The pass-through entity may choose to impose special conditions on the subrecipient's subaward based on the results of the risk assessment
- 2 CFR 200.207 discusses specific conditions the pass-through entity may impose such as:
  - Withholding authority to proceed to the next phase of a project until receipt of evidence of acceptable performance within a given period of performance
  - Requiring additional, more detailed financial reports
  - Requiring additional project monitoring
  - Requiring the non-Federal entity to obtain technical or management assistance
  - Establishing additional prior approvals
- Any special conditions imposed on the subrecipient should be included in the subaward Articles of Agreement

Subrecipient Monitoring

- Key things to remember about monitoring
  - Monitoring is **NOT** an audit
  - OHS is **NOT** out to catch you doing something wrong – we are there to **HELP** you to correct areas of noncompliance to prevent audit findings
  - Chance to provide technical assistance and answer questions



Subrecipient Monitoring - Cont.

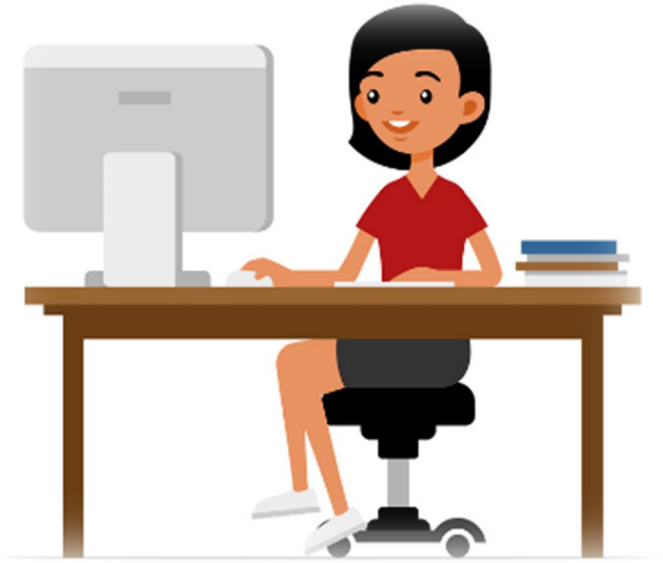
- Why do we have to monitor?
  - 2 CFR 200.328 (a) states, “The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable with applicable Federal requirements and performance expectations are being achieved.”
  - 2 CFR 200.331 (d) states, “all pass-through entities must monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal 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
- Topics covered
- 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 that the minimum standards
- Monitoring requirements for pass-through entities are dependent upon which entity is performing the procurement and purchasing

Minimum Pass-Through Monitoring Standards - Cont.

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

Minimum Pass-Through Monitoring Standards - Cont.

- If the **local subrecipient** agency performs all of the procurement and purchasing activities, the pass-through entity is required to monitor the following, as applicable:
  - All requirements that were required if the pass-through entity performed the procurement and purchasing
  - Procurement and purchasing
  - Internal control procedures/segregation of duties
  - Accounting system
  - Record Retention
  - Suspension and debarment

Minimum Pass-Through Monitoring Standards – Cont.

- At a minimum, the OHS requires pass-through entities to monitor 10% of their subrecipients (projects) for each grant cycle
- At least half of the required monitoring's must be conducted as on-site monitoring's
- Should select subrecipients with a higher risk indicated by risk assessment to be monitored
- If no high risk subrecipients, can choose which subrecipients to monitor

Minimum Pass-Through Monitoring Standards – Cont.

- Examples:
- Pass-through entity has 20 subrecipients for the FY 2020 grant cycle
  - 10% of 20 subrecipients = 2 monitorings
  - 1 monitoring must be conducted on-site
- Pass-through entity has 5 subrecipients for the FY 2020 grant cycle
  - 10% of 5 subrecipients = 1
  - Since only 1 monitoring is required it must be conducted on-site
- Documentation of completed monitoring must be maintained in the grant file
- The OHS maintains desk and on-site monitoring form templates available for use

Common Areas of Non Compliance/Recommendations

- Subawards
  - Not completed
  - Completed incorrectly
  - Doesn’t contain all required information
  - Not submitted to the OHS as required (uploaded in WebGrants)
- EHP
  - Not verifying if project requires EHP screening and clearance before project is started
- Procurement
  - Bid/quote requirements
  - Sole source purchasing requirements

Common Areas of Non Compliance/Recommendations– Cont.

- Advance Payment
  - Timeliness for providing proof of payment (30 days)
- Contracts
  - Doesn’t include required federal contract provisions
  - Contract not uploaded with claim in WebGrants
- Inventory
  - Missing information
  - Equipment items missing tags
  - Usage logs not containing all required information

Important Dates

- Signed Awards Due – October 30, 2020
- NCSR Completion Certificates Due – December 15, 2020
- Required EHP's - January 15, 2020
- Status Reports - January 10th and July 10th
- Spending Plan - March 4, 2022
- Regional Subaward Adjustments – May 31st, August 31st, November 30th, and February 28th
- Final Scope of Work Change Subaward Adjustment - June 2, 2022
- Period of Performance - September 1, 2020 – August 31, 2022
- Final Claim and Final Status Report – October 15, 2022

FY 2020 Threat Hazard Identification and Risk Analysis (THIRA)

Regionally

- THIRA update due tri-annually, SPR is due annually
- Whole Community Input Form (WCIF) due November 16, 2020
- 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

Questions?

OHS Contacts

Joni McCarter

Program Manager

(573) 526-9020

Joni.McCarter@dps.mo.gov

Michelle Branson

Grants Supervisor

(573) 526-9014

Michelle.Branson@dps.mo.gov

Chelsey Call

Grants Specialist

(573) 526-9203

Chelsey.Call@dps.mo.gov

Maggie Glick

Administrative Office Support Assistant

(573) 522-6125

Maggie.Glick@dps.mo.gov