SFY 2023 Economic Distress Zone (EDZ) Grant

COMPLIANCE WORKSHOP



Grant Requirements Grants

Economic Distress Zone (EDZ) Grant

The goal of the Economic Distress Zone (EDZ) Grant is to provide funding to organizations registered with the United States Internal Revenue Service (IRS) as a 501(c) (3) corporation who provide services to residents of the State of Missouri in areas of high incidents of crime and deteriorating infrastructure for the purpose of deterring criminal behavior.

Grant Requirements

- SFY 2023 EDZ Notice of Funding Opportunity (NOFO)
- Administrative Guide for Homeland Security Grants
- Information Bulletins
 - · Information Bulletin 1: Policy on Monitoring
 - Information Bulletin 2: Policy on Advance Payment and Cash Advances
 - Information Bulletin 5: Policy on Reimbursement Requests
 - <u>Information Bulletin 8: Policy on Budget and Program Revisions Subaward</u> Adjustments
- Missouri State Statutes

Audit Requirements

An audit is required if recipients expend \$375,000 or more in state funds within the organization's fiscal year from any state source (including, but not limited to EDZ)

- If the recipient is required to have an audit:
- The audit must be performed organization-wide by an independent firm
- The audit must be conducted with reasonable frequency, usually annually, but no less than every two (2) years

If the recipient is not required to have an audit, the agency is still responsible for monitoring activities to provide reasonable assurance that the agency administers state awards in compliance with state requirements

This does not mean that the audit can include every other year!

State Civil Rights

Section 213.055 RSMo – Unlawful Employment Practices

 May not discriminate on the basis of race, color, religion, national origin, sex, ancestry, age, or disability in its employment practices (e.g. hiring, compensation, conditions, or privileges)

Section 213.065 RSMo – Discrimination in Public Accommodations

- May not discriminate on the basis of race, color, religion, national origin, sex, ancestry, or disability in the use and enjoyment of any place of public accommodation
- It is unlawful to refuse, withhold from, or deny any of the accommodations, advantages, facilities, services, or privileges made available in any place of public accommodations

Section 285.530.1 RSMo – Employment of Unauthorized Aliens Prohibited

An agency will not knowingly employ, hire for employment, or continue to employ an unauthorized alien to perform work within the State of Missouri

Grant Life Cycle

- Recipient submits an application
- Recipient receives an award letter and invitation to Compliance Workshop
- Recipient attends Compliance Workshop
- Recipient will receive the award documents via email
 - Award documents must be signed and each page of the Articles of Agreement initialed by the Authorized Official and sent to Department of Public Safety
 - Application will be negotiated via WebGrants to update budget to reflect partial awards and remove unallowable items
 - Once the signed documents are received and signed by the Director of Public Safety, and application budget corrections completed – the grant will be marked "Underway"

Grant Life Cycle

"Underway" Phase

- Recipient can now begin work on project: <u>REVIEW THE APPROVED BUDGET</u>
- Claims are to be submitted for Reimbursement or Advanced Payment
- Status Reports are submitted

Closeout

 Once all Claims and Status Reports have been submitted and approved the grant can be closed

Spending Grant Dollars

- •Funds must be obligated within the project period of performance, expended, and submitted for reimbursement within 45 days following the project period of performance end date (June 15, 2023)
- Project Period: July 1, 2022 to April 30, 2023
- •Funds are considered "obligated" when a legal liability to pay a determinable sum for services or goods is incurred and will require payment during the same or future period
- •Funds are considered "expended" when payment is made

Grant Reporting

- Status Reports **MUST** be completed
- March 15, 2023: for July 1, 2022-February 28, 2023
- June 15, 2023: for March 1, 2023-April 30, 2023

Procurement Requirements

- With any expenditure, the recipient 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
- If a recipient is uncertain as to whether a cost meets these requirements, please contact the OHS for clarification

Procurement Requirements

- Recipient must follow their agency's procurement policy unless the State of Missouri policy is more restrictive
- •If the recipient does not have a procurement policy, they must follow the State of Missouri procurement policy
- State of Missouri Revised Statutes Chapter 34, State Purchasing and Printing
- Missouri Rules of Office of Administration Division 40 Purchasing and Materials Management
- Cooperative Procurement Option If utilizing cooperative contract, procurement documents (quotes/bids) and invoice must reference cooperative contract number

Procurement Requirements

General Guidelines

- All procurement transactions, whether negotiated or competitively bid, and without regard to the dollar value, shall be conducted in a manner so as to provide maximum open and free competition
- All bids/quotes, and the rationale behind the selection of a source of supply, must be retained, attached to the
 purchase order copy, and placed in the accounting files

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 recipient'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

Procurement Requirements

State of Missouri Procurement Guidelines

\$10,000 - \$99,999 Less than \$10,000 Greater than \$100,000 Formal solicitation required Purchase with prudence on the Must be competitively bid open market Advertised in at least two daily newspapers for general circulation at least 5 consecutive days before bids are to be opened Informal method is acceptable Minimum of 3 bids/quote May also advertise in at least 2 weekly minority newspapers & provide through an electronic medium available to general public Ex. Telephone quote, online pricing, request for quotation Post a notice in a public area of your office Solicit by mail or other reasonable methods generally available to the public OHS must approve if less than 3 bids received

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

Single Feasible Source

- Use of a single feasible source procurement of \$10,000.00 or more requires prior approval from the OHS.
- Single feasible source form can be located on the DPS website in the <u>Grant Applications and Forms</u> section
- If purchase is made using a single feasible source without prior approval, OHS has the right to refuse reimbursement





Single Feasible Source

Use of single feasible source procurement is discouraged. A single feasible source procurement exists when:

- 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

Who Are You Doing Business With?

Recipients are required to verify that vendors used for grant purchases are not on either the State Suspended/Debarred Vendors List

State of Missouri Office of Administration

Maintain a copy of a screenshot in the grant file to verify this was completed



Equipment vs. Supplies

Equipment

- Tangible, non-expendable (non-consumable) personal property having a useful life of more than one year and an acquisition cost of \$1,000 or more per unit
- Equipment must be recorded and tracked in an Inventory control list and tagged to reflect its source of funding
- Equipment must be "tagged" with the source of funds used to purchase the item(s)

Supplies

Items that do not fit into the "Equipment" category

Equipment Records/Inventory

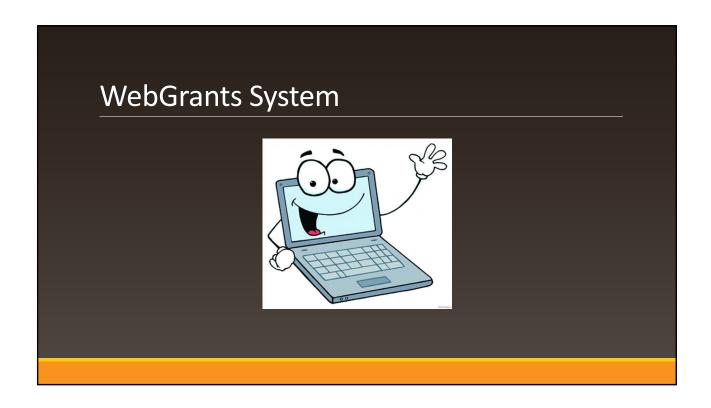
Records shall include an inventory control list for non-expendable property

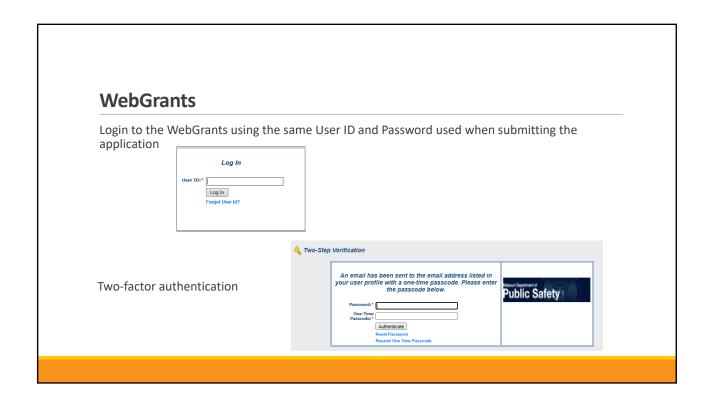
Property must be tagged by the recipient; the tag should identify the item's source of funds, where feasible.

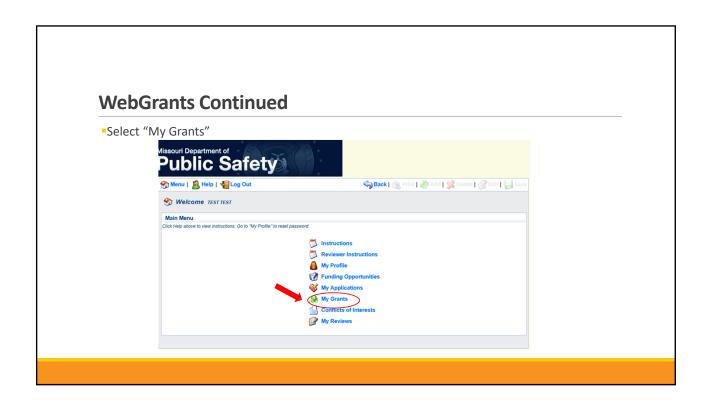
"Purchased with SFY 2023 EDZ Funds"

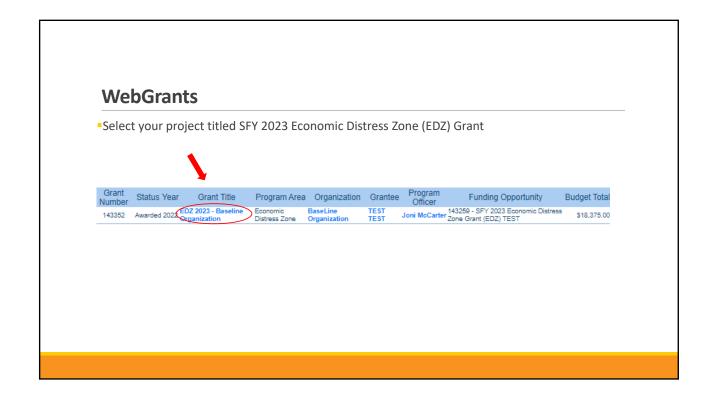
Equipment Disposition

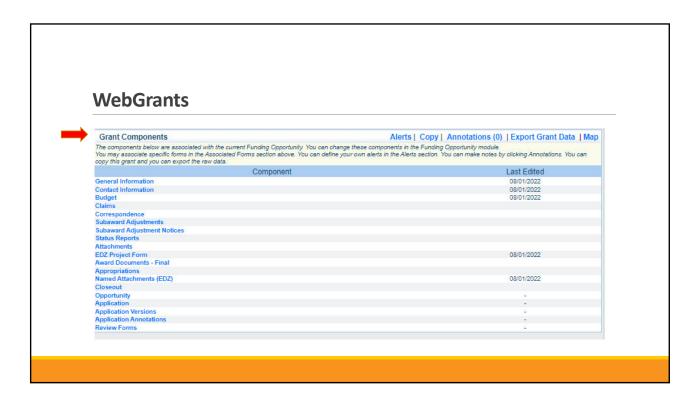
- Recipients must request approval from the OHS prior to disposing of equipment. Procedures in the OHS Administrative Guide for Homeland Security Grants must be followed to request equipment disposition approval. Email the Equipment Disposition Forms to Kelsey Saunders at Kelsey.Saunders@dps.mo.gov
- A copy of the approved <u>Equipment Disposition Form</u> must be maintained in the recipient grant file
- Equipment Disposition Form found on the OHS website

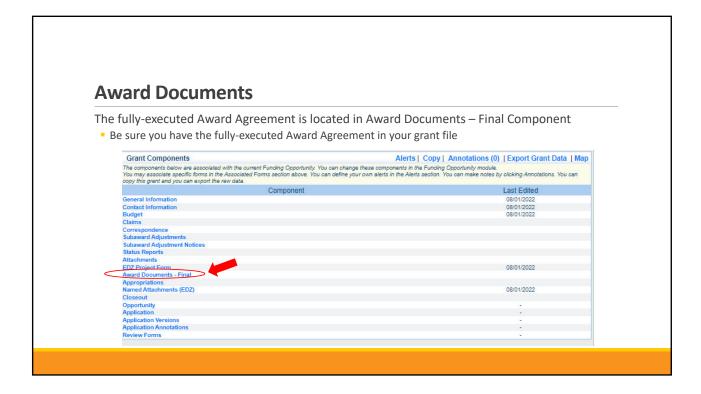










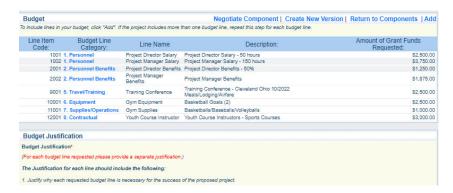


Budget

Approved budget is located in Budget Component

- Be sure to review approved budget before beginning procurement
- Ensure you are only purchasing items that are on approved budget
- Ensure you are purchasing the quantity of items that is on approved budget
- Request Subaward Adjustment if need to make changes to budget (i.e. change in quantity)

Budget





<u>Information Bulletin 5: Policy on Reimbursement Requests</u> discusses requirements for reimbursement requests

- •Must incur an allowable expense, make payment, and seek reimbursement within 6 months of the invoice date
- Supporting documentation must be submitted with each claim
 - Must be in one attachment and in the same order as the Expenditures Form on the reimbursement request in WebGrants
- In the Expenditure Form in WebGrants, 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 a different line in the approved budget
- Incomplete claims could result in a delay of payment. It is the requesting agency's responsibility to complete the necessary changes

Reimbursement Requests (Claims)

Personnel/Benefits Supporting Documentation

- Claim in WebGrants
- Wage and benefit costs
- Proof of payment (payroll journal, check stub)
- Timesheet(s)
- Signed personnel certification(s)

Travel/Training Supporting Documentation

- Claim in WebGrants
- Vendor Invoice
- Proof of Payment (copy of cancelled check, credit card statement, bank statement)
- Agenda/Announcement
- Proof of attendance (sign-in sheet/roster/certificate)

*Meals, mileage, and lodging cannot exceed the state of Missouri rates established by the Missouri Office of Administration. Current rates can be found at Missouri Office of Administration-State of Employees

Reimbursement Requests (Claims)

Equipment Supporting Documentation

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

Supplies Supporting Documentation

- Claim in WebGrants
- Vendor Invoice
- Proof of Payment (i.e., copy of cancelled check, credit card statement, or bank statement)
- Proof of delivery/completion (i.e., signed packing slip, signed receipt, or signed statement in writing indicating items delivered)

Reimbursement Requests (Claims)

Contractual Services Supporting Documentation

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

Advance Payment

<u>Information Bulletin 2: Policy on Advance Payment and Cash Advances</u> discusses requirements for advance payment requests

- Advance payment is defined as funds given to a recipient in advance of the recipient incurring the debt. For example, if a recipient orders a piece of equipment and requests reimbursement prior to paying the vendor's invoice, receipt of funds would be considered an advance payment
- Will not provide advance payment to a recipient before costs have been incurred through an invoice from a vendor
 - Some situations, local cash flow makes payment for large equipment items difficult
 - OHS has agreed to accept requests for funds from recipients as soon as a vendor submits their invoice and the recipient has received goods or services
- \$2,500 minimum for recipients requesting a reimbursement with an advance payment

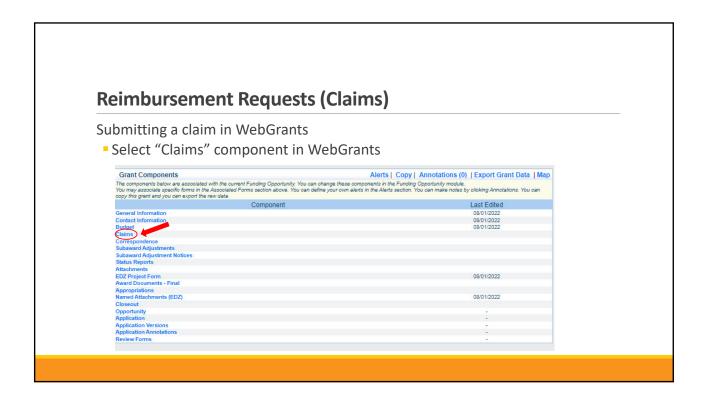
Reimbursement Requests (Claims)

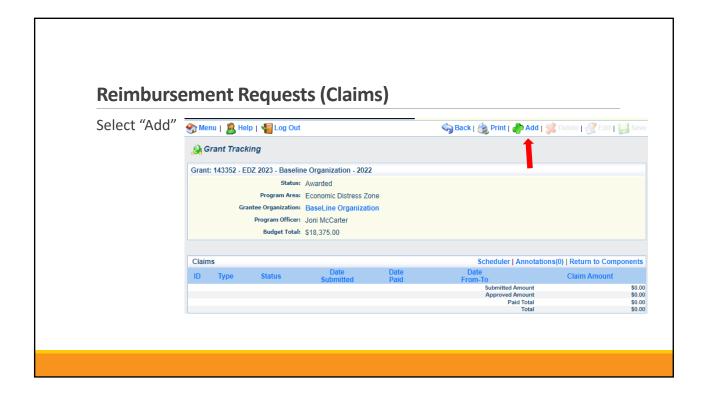
Advance Payment Supporting Documentation

- Claim in WebGrants
- Vendor Invoice
- Proof of delivery/completion (i.e., signed packing slip, receipt, or signed statement in writing indicating items delivered)
- Completed Equipment Detail Form in WebGrants, if applicable

Required to submit proof of payment (i.e., copy of cancelled check, credit card statement, or bank statement) to the OHS within 30 days from receipt of payment

To request, will type "Advance Payment" in the Check/EFT Number and Check/EFT Date fields in the WebGrants claim

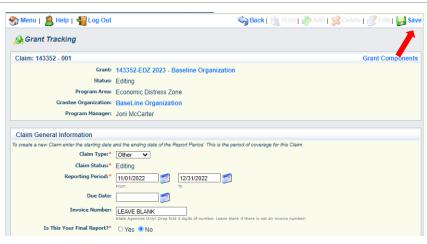


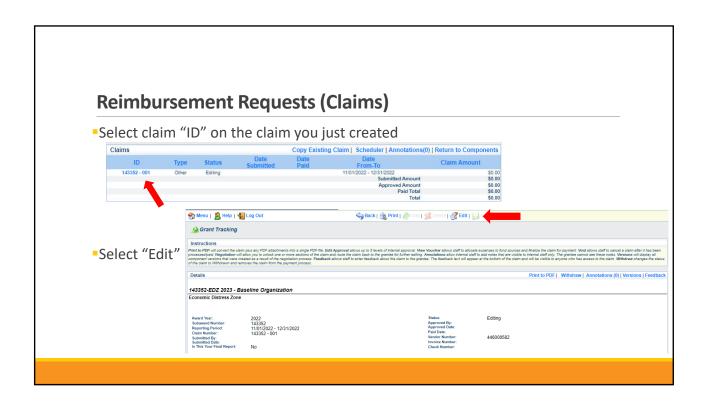


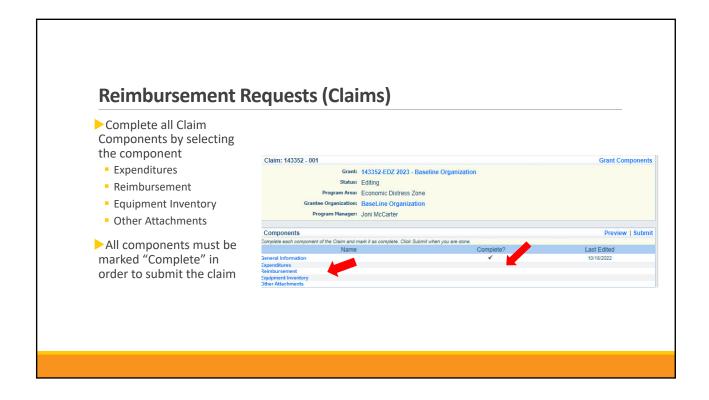
Complete Claim General Information

- Claim Type Select "Monthly/Quarterly/Other" in the drop-down
- Reporting Period Enter the date range for the expenses being requested
- Invoice Number Leave field blank
- Is this your Final Report
- Select "Yes" if this is your last claim
- Select "No" if this is not your last claim
- Select "Save"

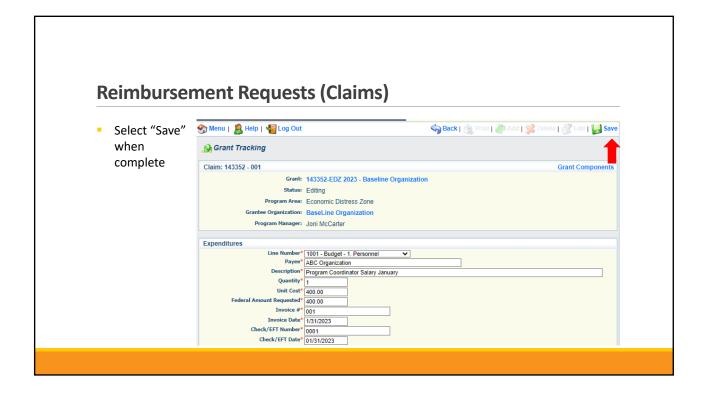
Reimbursement Requests (Claims)











Line Number – select the corresponding budget line for the item that is being requested for reimbursement

Payee – enter the name of the vendor that the item was purchased from

Description – enter a description of the item purchased

Quantity – enter the quantity of the item that was purchased

Unit Cost - Cost per item

• The number entered into the unit cost field, multiplied by the quantity entered, should be the Federal Amount Requested that you are seeking reimbursement for

Federal Amount Requested – Total amount of funds being requested

Invoice # - vendor's invoice number

Invoice Date – date on vendor's invoice

Check/EFT Number

- Check number used for payment to vendor **OR** EFT number for payment to vendor
- Advance Payment

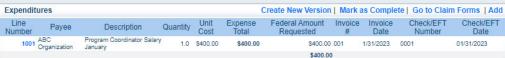
Check/EFT Date

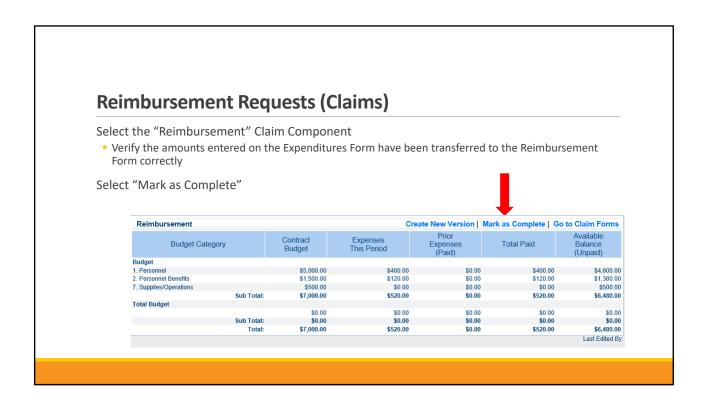
- Date of check used for payment to vendor OR Date of EFT for payment to vendor
- Advance Payment

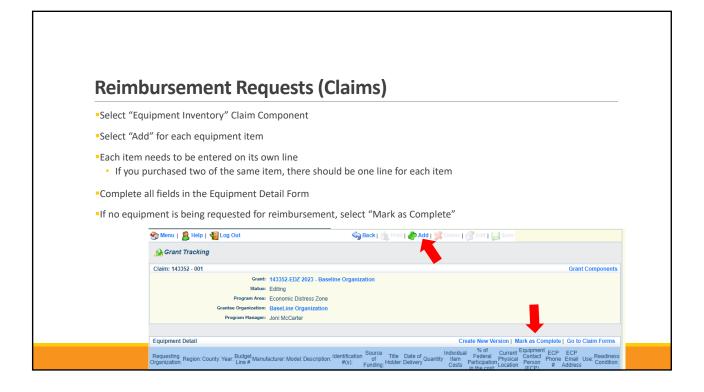
Reimbursement Requests (Claims)

- Select "Add" to add additional expenditures to the claim
- Select "Mark as Complete" after all expenditures have been added









If equipment is requested, complete all fields in the Equipment Detail Form

Requesting Organization - Recipient's Organization

Region – Recipient's Region

County - Recipient's County

Year - Grant year the equipment was purchased (2023)

Budget Line # - Budget line number associated with the equipment

Manufacturer - Manufacturer of the equipment

Model - Model number of the equipment

Description - Description of the equipment (i.e., Laptop, Printer)

Identification # - Unique identification numbers such as serial number. N/A should be annotated if there is not a serial number

Source of Funding – Source of funding utilized (EDZ)

Title Holder – Recipient Organization who owns the equipment

Reimbursement Requests (Claims)

Date of Delivery – Date equipment was delivered

Quantity – Number of equipment items purchased (should only be one per line)

Individual Item Costs – Cost of individual equipment item

% of Federal Participation in the Cost - Percentage of cost of the equipment that is being requested

Current Physical Location – Address where the equipment is located (P.O. Box is not a physical location for the inventory)

Equipment Contact Person (ECP) – Name of person to contact regarding equipment

ECP Phone # - Phone number for equipment contact person

ECP Email Address – Email address for equipment contact person

Use – Local, regional, statewide, or national. Progressive scale. If national use is entered, it is assumed it is available at all other levels

Readiness Condition

- Mission capable material condition of equipment indicating it can perform at least one and potentially all of its designated missions
- Not mission capable material condition indicating that equipment is not capable of performing any of its designated mission

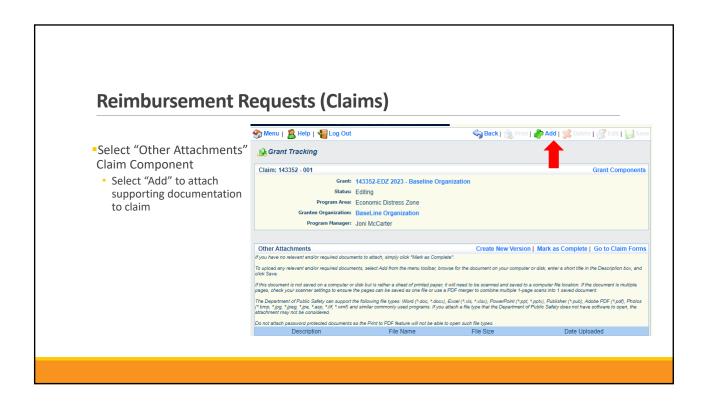


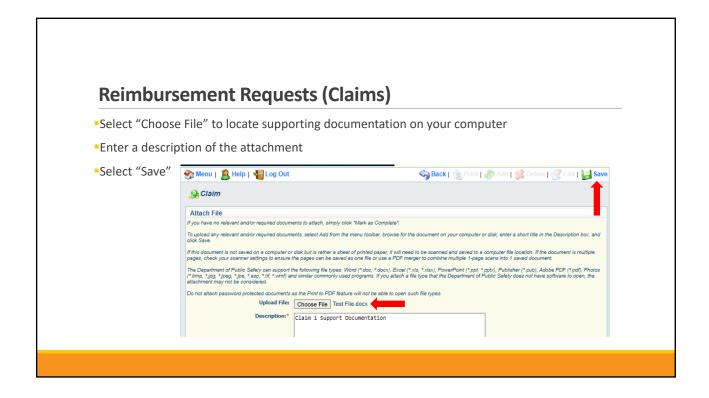
Reimbursement Requests (Claims)

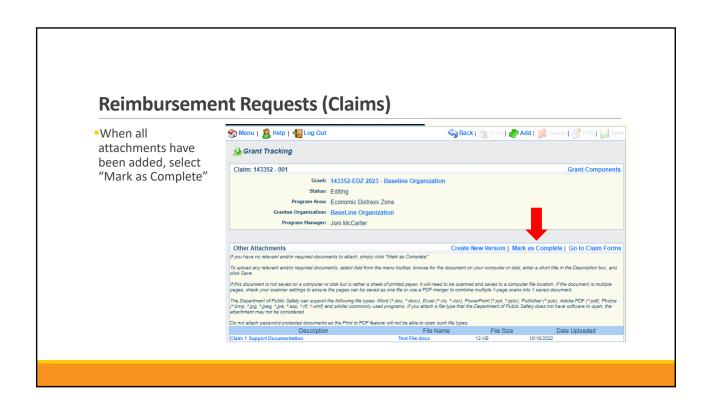
Verify Equipment Detail is correct and select "Mark as Complete"

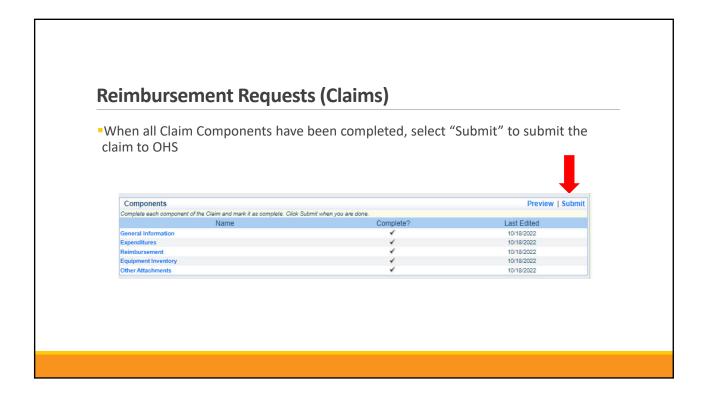












Subaward Adjustments

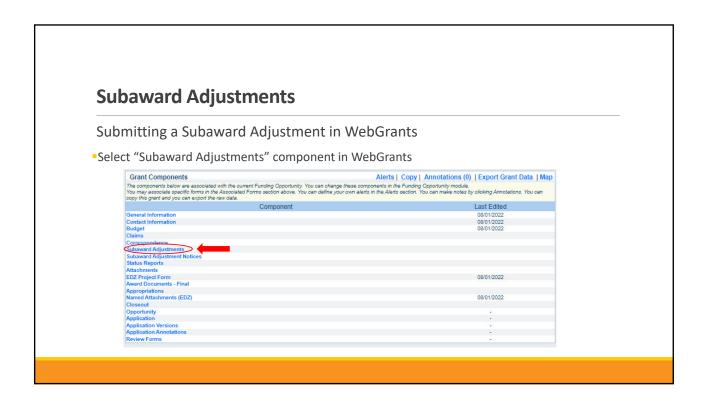
<u>Information Bulletin 8: Policy on Budget and Program Revisions – Subaward Adjustments</u> discusses Subaward Adjustments

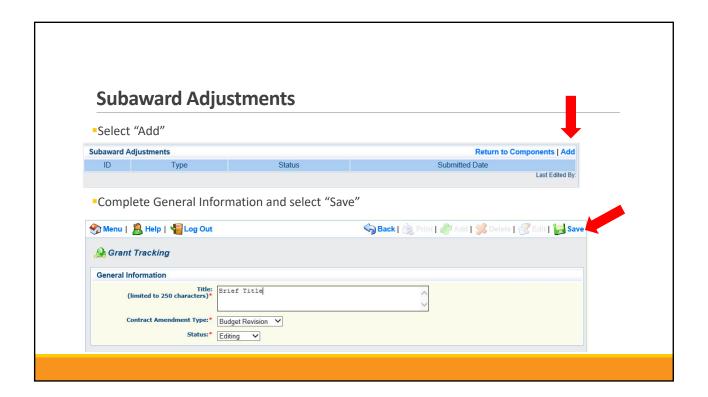
- Budget Modifications transfer among existing budget lines within the grant budget
 - Request for budget modification must be submitted through WebGrants as a Subaward Adjustment and <u>must</u> be approved by the OHS <u>prior</u> to the recipient obligating or expending the grant funds
- Program Modifications
 - Request for program modifications must be submitted through WebGrants as a Subaward Adjustment and must be approved by the OHS prior to the recipient obligating or expending the grant funds
 - Program modifications include:
 - ✓ Changes in recipient staff (Authorized Officials, Project Directors, or Fiscal Officers)
 - ✓ Address change or other information in the organization component of WebGrants



Subaward Adjustments

- Scope of Work Changes
 - · Adding new line items to the approved budget
 - Changes in quantity of an existing line item in approved budget
 - Changes to specifications of existing line item (i.e., an equipment line item on the approved budget lists a 12'x 20' tent, in order to purchase a tent that is 10' x 10' instead of the listed equipment, prior approval is required
- Request for scope changes must be submitted through WebGrants as a Subaward Adjustment and must be approved by the OHS prior to the recipient obligating or expending the grant funds

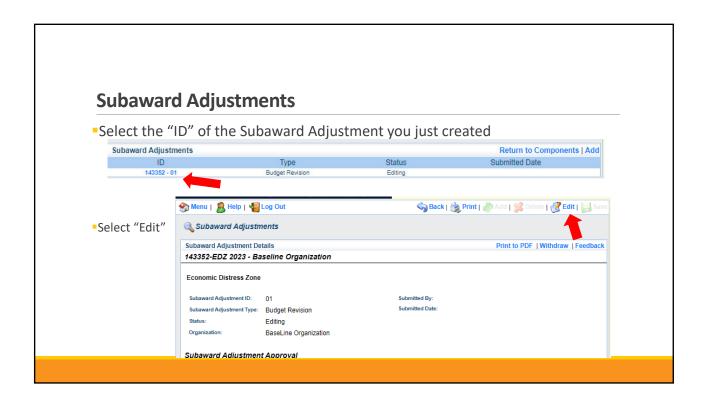




Subaward Adjustments

General Information

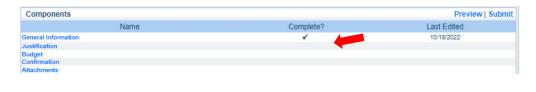
- Title enter a brief title
- Contract Amendment Type choose the type of adjustment being requested
 - Budget Revision
 - Program Revision

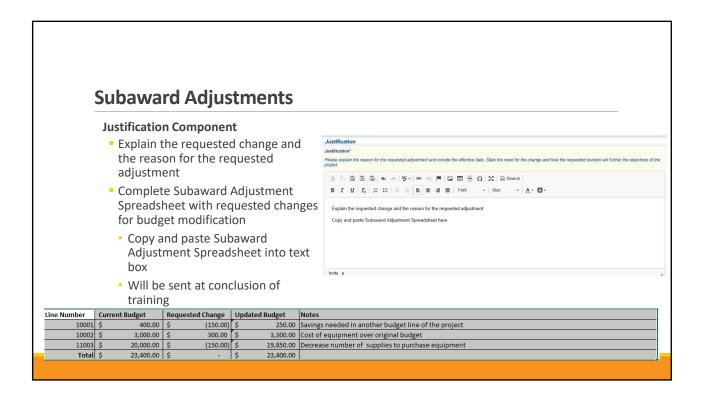


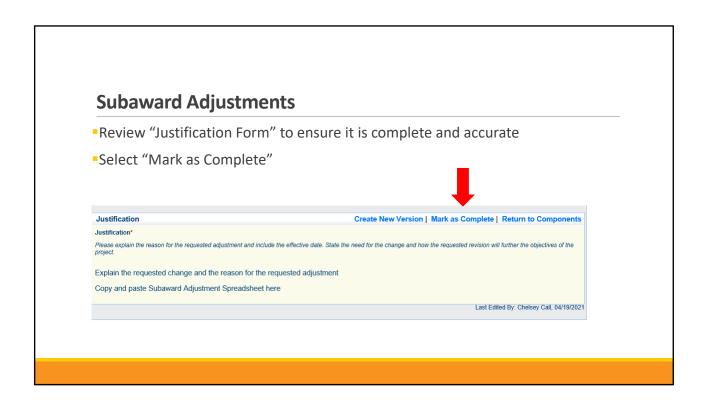
Subaward Adjustments

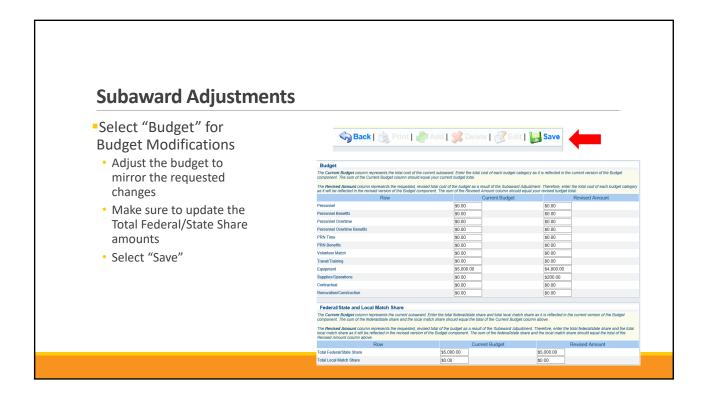
- Complete all Subaward Adjustment Components by selecting the Component
 - Justification
 - Budget
 - Confirmation
 - Attachments

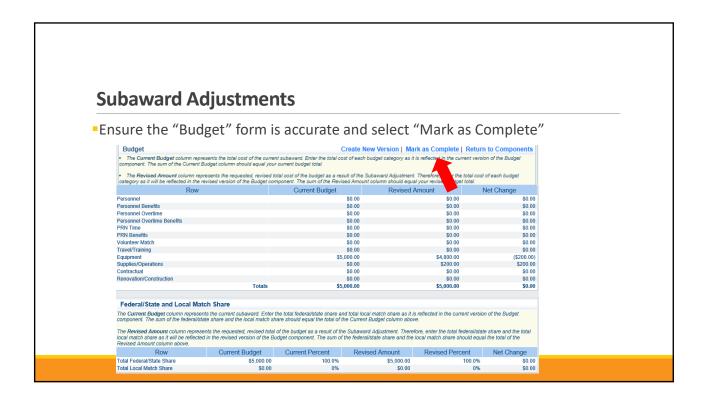
All components must be marked "Complete" in order to submit the Subaward Adjustment

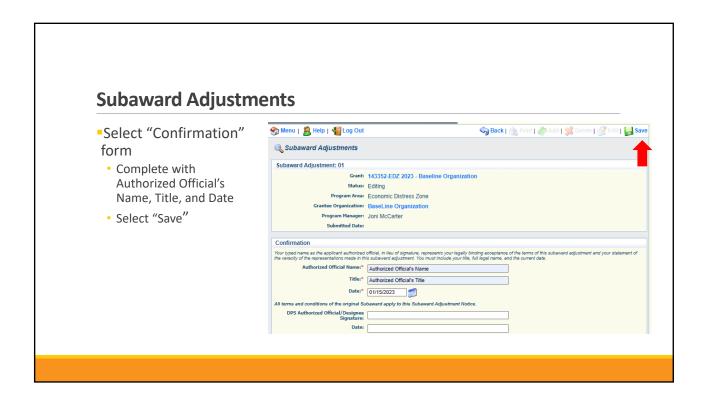


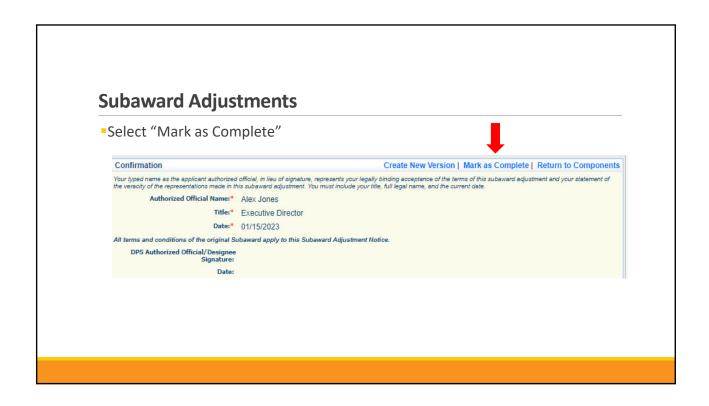


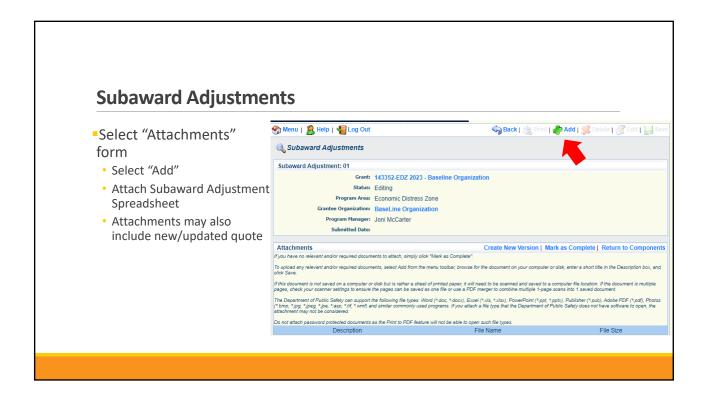


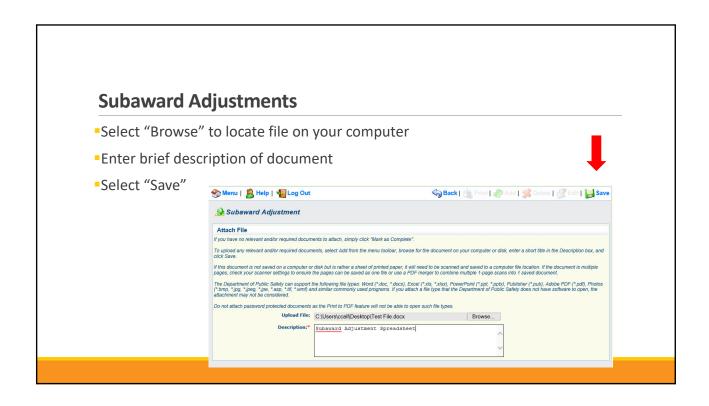


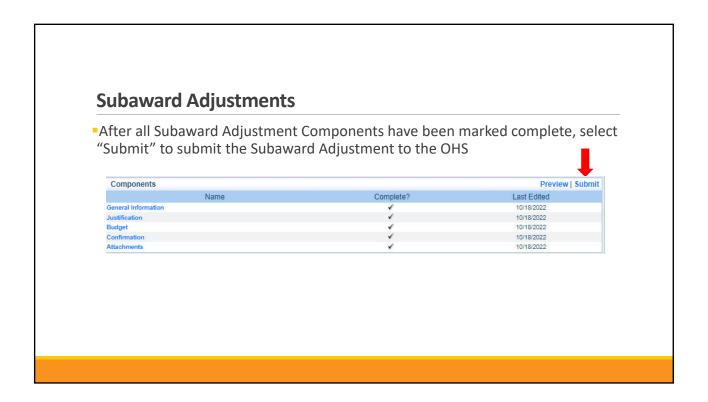


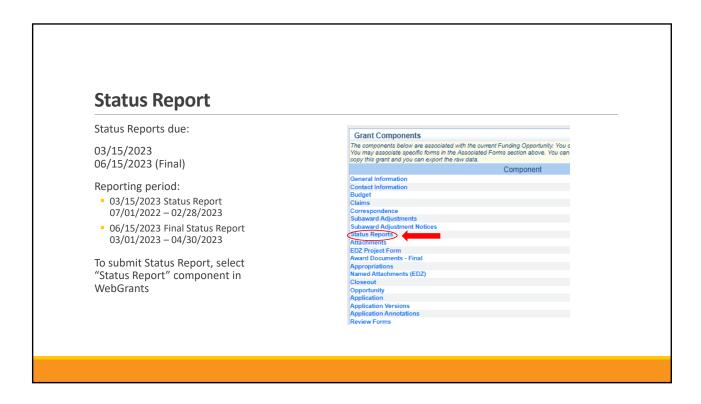


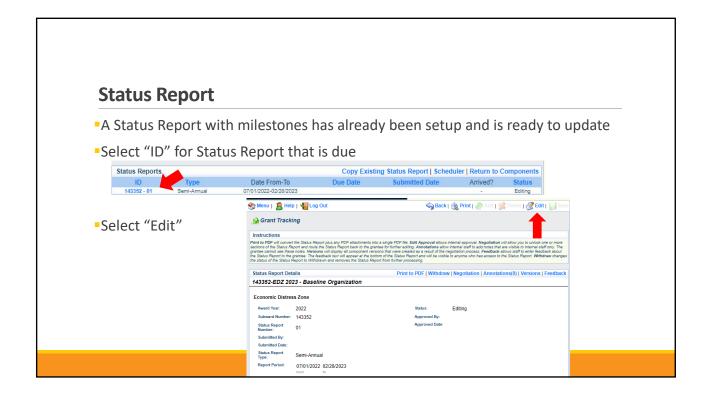


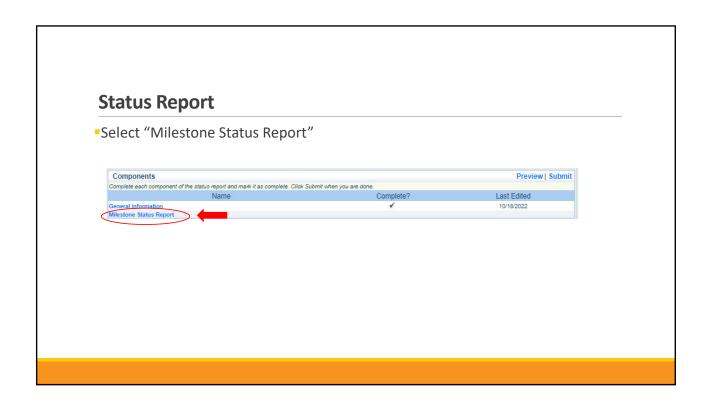


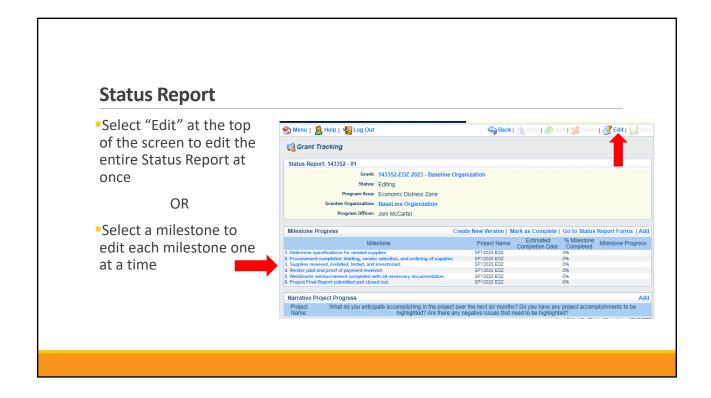








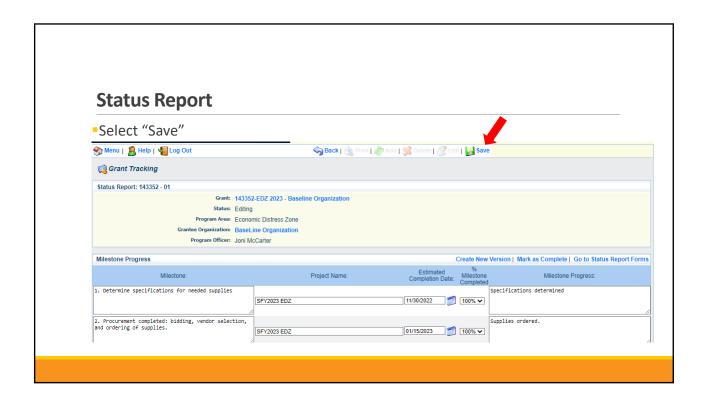


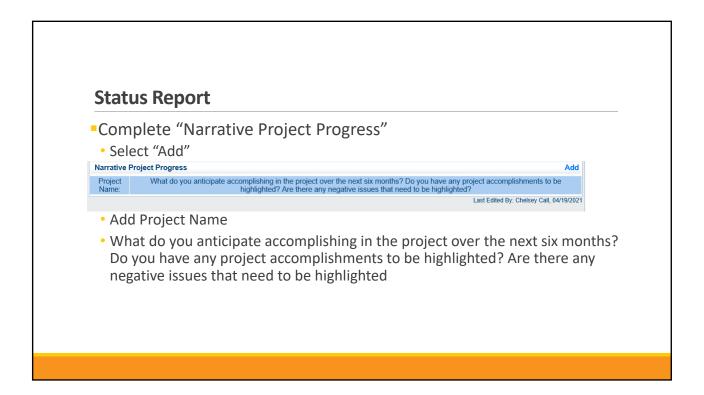


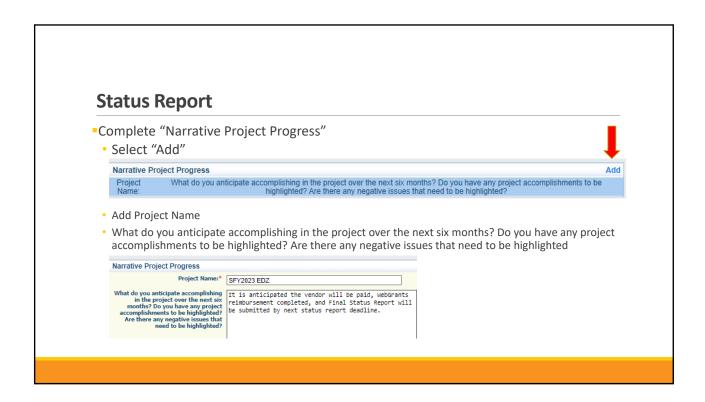
Status Report

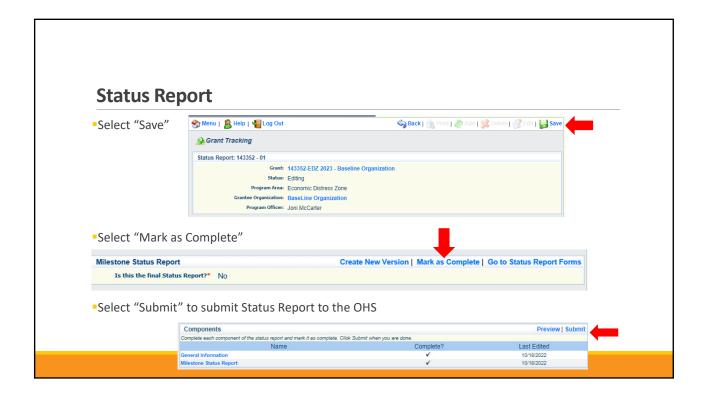
- Complete "Milestone Progress" section of Status Report
 - Project Name Brief project name (i.e., SFY 2023 Baseline Organization EDZ)
 - Estimated Completion Date Estimated completion date for milestone at time of status report
 - % Milestone Completed Estimated % of milestone completed at time of status report
 - Milestone Progress Enter pertinent notes on milestone (i.e., Specifications for mobile radio complete)







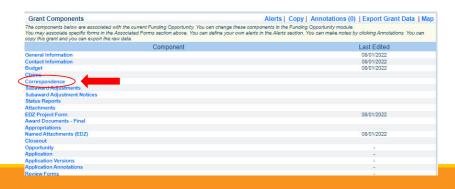


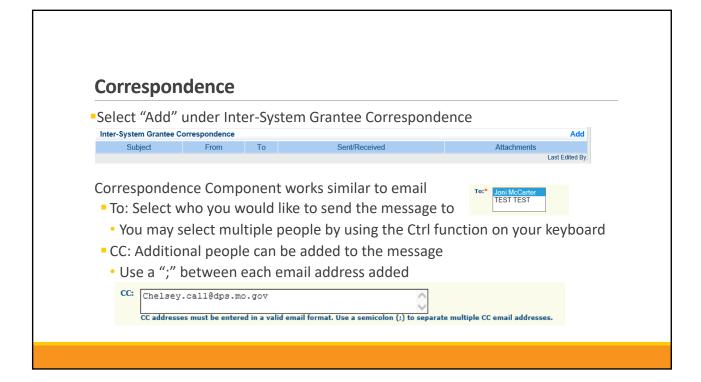


Correspondence

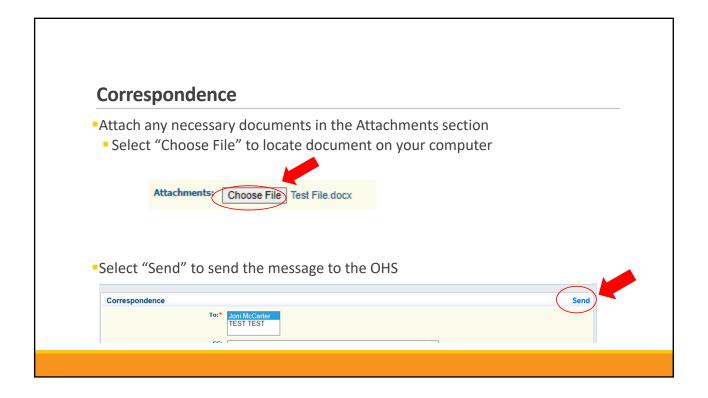
Correspondence Component of the grant should be used for contacting the OHS with questions/pertinent information regarding your grant

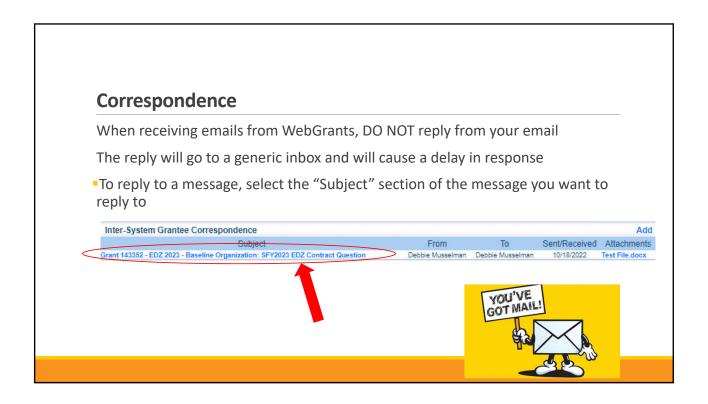
Select "Correspondence" component in WebGrants

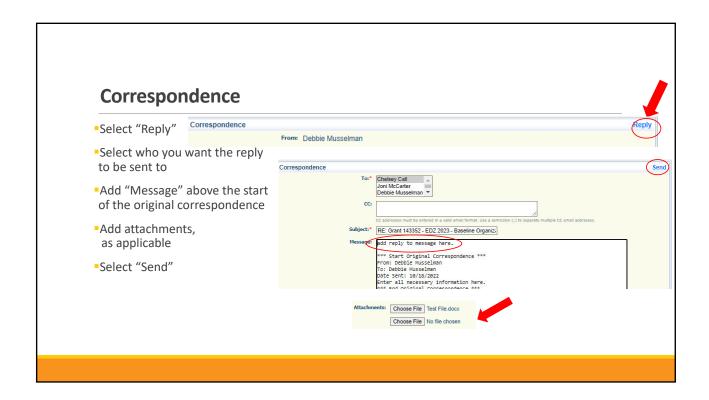












Grant File

All grant records shall be retained by the recipient for:

• At least 5 years from the end of the state fiscal year in which the grant closes or following notification by the awarding agency that the grant has been programmatically and fiscally closed or at least 5 years following the closure of the recipient's audit report covering the entire award period, whichever is later

Recipient should maintain grant file with grant documentation including but not limited to:

- Copy of grant application(s)
- 2. Award
- 3. Approved Claims
- 4. Approved Subaward Adjustments
- 5. Approved Status Reports
- 6. Final Status Report

- 7. Monitoring Reports
- 8. Relevant Grant Correspondence
- 9. Procurement Documents
- 10. Disposition of Equipment Forms
- 11. Equipment Inventory

Grant Closeout

- Grant Period of Performance ends 04/30/2023
- •Final Claims and Final Status Report are due 45 days after the end of the period of performance (06/15/2023)
- •Final Claim Select "<u>Yes</u>" in "General Information" on the question "Is this your Final Report"
- Final Status Report
 - In the "Narrative Project Progress" section indicate that the project is complete and this submission is the Final Status Report.
 - Include amount of de-obligated funds, if applicable, in the Narrative Project Progress section

Monitoring

<u>Information Bulletin 1: Policy on Monitoring</u> discusses monitoring

Types of Monitoring

- Desk Review completed by the OHS at the OHS' office
- On-Site Review conducted by the OHS at the recipient's agency





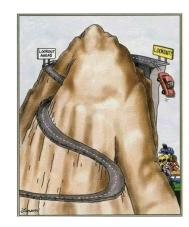
Monitoring

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



Monitoring

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



Important Dates Grant Period of Performance Begin – July 1, 2022 Compliance Workshop Acknowledgement Due – November 16, 2022 Signed Subaward Agreement Due – November 28, 2022 Status Report Due – March 15, 2023 Grant Period of Performance End – April 30, 2023 Final Claim and Final Status Report – June 15, 2023

Questions



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