

Emergency Management Performance Grant



EMPG Program Updates



- FY 2020 EMPG Local Awards
- FY2020 EMPG Supplemental: COVID-19
- Administered by the State Emergency Management Agency

Historical Data for EMPG Funding



| Year | County | City | Total Subrecipients | EMPG Funding |
|-------------|---------------|-------------|--------------------------------|---------------------|
| FY2007 | 60 | 34 | 94 | 3,703,462 |
| FY2008 | 63 | 35 | 98 | 5,542,002 |
| FY2009 | 67 | 35 | 102 | 5,820,548 |
| FY2010 | 69 | 35 | 104 | 6,264,436 |
| FY2011 | 69 | 38 | 107 | 6,256,678 |
| FY2012 | 70 | 35 | 105 | 6,422,580 |
| FY2013 | 75 | 40 | 115 | 6,269,534 |
| FY2014 | 75 | 45 | 120 | 6,590,063 |
| FY2015 | 72 | 45 | 117 | 6,570,000 |
| FY2016 | 70 | 50 | 120 | 6,552,785 |
| FY2017 | 75 | 47 | 122 | 6,538,987 |
| FY2018 | 70 | 42 | 112 | 6,522,105 |
| FY2019 | 77 | 45 | 122 | 6,520,000 |
| FY2020 | 74 | 48 | 122 | 6,602,323 |

2020 EMPG Award Amounts



- Federal Award Amount: \$6,602,323
 - \$2,636,885 million for SEMA (42%)
 - \$3,965,438 million for local (58%)
- EMPG Supplemental: \$1,859,809
 - All funds to locals

Funding Priorities for FY 20



- Existing Personnel Positions
- Essential Operating Expenses
- Essential EOC Equipment (below \$30,000)
- Essential Travel

Budget Review



- **Is it:**

- Allowable?
- Allocable?
- Reasonable?
- Necessary?

Allowable Cost Functions



- **Planning**
- **Organization**
- **Equipment (always consult the AEL for eligibility)**
- **Training**
- **Exercise**

See specific grant guidance for allowable costs

Training Requirements



- Introduced in FY11 EMPG
- Required of all EMPG funded personnel
 - Complete 11 FEMA Professional Development Series courses or complete EMI Basic Academy
 - HSEEP course required if conducting, planning or preparing after action reports
 - Refer to Information Bulletin released last year

Non-compliance will result in a loss of funds.

Exercise Requirements



- 2 exercises per performance period of which one must be operations based
- Submit AAR/IP or Summary AND sign-in sheets (with signatures or a report from a recognized software such as Elliott or Salamander showing signed in/out times)
- AAR/IPs need to be submitted to Training and Exercise within 90 days after completion of the exercise.

Missouri Day-to-Day Emergency Management Program Functions



- Laws and Authorities
- Threat and Hazard Analysis
- Planning
- Operations and Procedures
- Communication and Population Warning
- Direction and Control
- Resource Management
- Hazard Mitigation
- Logistics and Facilities
- Training
- Exercises, Evaluation and Corrective Actions
- Public Information and Education
- Finance and Administration

Who are you doing business with?



- Jurisdictions are required to verify that the vendors used for grant purchases are not on the Excluded Parties List (EPLS)
 - Federal, System For Award Management
 - ✦ <https://www.sam.gov/portal/SAM/#1>
 - State of Missouri
 - ✦ <http://oa.mo.gov/sites/default/files/suspven.pdf>

Equipment Tagging Guidelines



- All equipment must be tagged.
- All tags must state “Purchased with U.S. Department of Homeland Security funds”
- Expiration and calibration dates will also be noted
- Special note:
 - Vehicle logs are *required and will be inspected* for mileage and proper usage

National Incident Management System (NIMS)



- Subrecipients must ensure the adoption and implementation of NIMS
 - Training certificates
 - Training matrix
 - City/County ordinance or resolution
 - Implementation plan
 - EOPs
 - Report accomplishment towards implementation in each quarter Status Report
 - For more information, please refer back to the Information Bulletin

NIMS Refresh



- The revised guidance reorganizes the document, and removes the Preparedness component to avoid redundancy with the National Preparedness System and the National Preparedness Goal- both of which were released after the 2008 version of NIMS.
- The purpose of the NIMS refresh is to strengthen guidance for effective incident management.

Strings Attached



**FEDERAL TERMS AND
CONDITIONS ATTACHED TO
FUNDING**

Authorities for Compliance



- Public & Program Laws
- Federal Regulations (44 CFR) (2 CFR)
- OMB Circulars
- Terms & Conditions of Grant Award
- Program Guidance
- DHS Policy
- FEMA Policy
- SEMA Policy

Which Regulation do I Follow?



- **States and Local Governments:**

- 2 CFR Chapter 1 Part 200 – Uniform Admin Requirements, Cost Principles & Audit Requirements for Federal Awards

- ✦ Effective for awards after December 26, 2014.



Office of Management and Budget



- Grant Management Regulations

- 2 CFR 200 Subpart E

- ✦ Cost Principles

- 2 CFR 200 Subpart C and Subpart D

- ✦ Administrative Requirements

- 2 CRF 200 Subpart F

- ✦ Audit Requirements

Code of Federal Regulations



- **TITLE 44--Emergency Management and Assistance**
 - [Part 13 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments](#)

Anti-Lobbying Act (18 U.S.C. § 1913)



- No federally appropriated funding made available under a grant program may be used, either directly or indirectly, to support the enactment, repeal, modification or adoption of any law, regulation, or policy, at any level of government.

Financial and Government 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 200 Subpart F
- Recipients 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 to the [Federal Audit Clearinghouse](#) within the earlier of 30 calendar days after receipt of the auditor's report(s) or 9 months after the end of the audit period.

2 CFR 200 Subpart F



- Consistency and uniformity for the audit of non-Federal entities
- Requires that Audits be performed annually
- Identifies a “pass-through entity” that provides a Federal award to a subrecipient

2 CFR 200 Subpart F



- **Top Audit Findings**
 - Accounting procedures need improvement
 - Grant reporting requirements not met
 - Grant management procedures need improvement
 - Cash management procedures need improvement

Cost Principles



- Requires that a cost be:
 - Allowable and allocable
 - Necessary to the performance of a project
 - Reasonable
 - Non-profitable
 - Claimed against only one award
 - Permissible under State and Federal laws and regulations
 - Adequately supported by source documentation such as checks, payrolls, contracts, etc.

Procurement



- Locals must follow 2 CFR part 200.318 through 200.326 when purchasing or entering into a contract.
- Subrecipients must follow its own documented procurement procedures which reflect applicable state, local, and tribal laws and regulations, provided that the procurements conform to applicable federal law and the standards identified in the CFR.

Procurement Continued



- The procurement standards can be broken down into the following categories:
 - General procurement standards (2 C.F.R. §200.318)
 - Competition (2 C.F.R. §200.319)
 - Methods of procurement (2 C.F.R. §200.320)
 - Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms (2 C.F.R. §200.321)
 - Procurement of recovered materials (2 C.F.R. §200.322)
 - Contract cost and price (2 C.F.R. §200.323)
 - Awarding agency and pass-through entity review (2 C.F.R. §200.324)
 - Bonding requirements (2 C.F.R. §200.325)
 - Contract provisions (2 C.F.R. §200.326 and Appendix II)

Procurement Continued



- **Competition**

- A non-Federal entity must conduct procurement transactions in a manner providing “full and open competition” consistent with the standards of 2 C.F.R. §200.319
 - Contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from participating for such procurements (new)
 - A non-Federal entity must conduct procurements in a manner that ***prohibits*** the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except where federal law expressly mandates or encourages geographic preference
 - A non-Federal entity may use pre-qualified lists of persons, firms, or products, subject to certain conditions
- A non-Federal entity must have written procedures for procurement transactions, which must ensure the solicitations provide for at least the following (2 C.F.R. §200.319(c))
 - Incorporate a clear and accurate description of the technical requirements for the material product, or service procured
 - Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals

Supplanting



- Deliberately reducing State or local funds because of the existence of Federal funds
- Discovering supplanting will result in the immediate return of federal funds related to the expenditure and project
- To avoid supplanting, you must receive prior approval before the expenditure is obligated.
- Supplanting puts ***all federal funds at risk***

Supplanting Continued:



- The purpose of EMPG funds is to go above and beyond your approved city/county budget (supplement)
- It is not a 50% off ticket to your approved city/county budget (supplant)
- If an agency is going to purchase something regardless of grant funding, they cannot go back and claim it through the grant. They have agreed to incur the cost and are obligated.
- City/county budgets should reflect approved budget and anticipated grant funding.

CARES Act and EMPG Supplemental



- With the passing of the CARES Act, there are multiple funding sources for COVID-19 preparedness, mitigation and response.
- It will be very important to properly track which funds are being used where.
- If you are being reimbursed through the CARES Act you cannot claim it anywhere else.
- The funds to the counties will trigger a single audit for most (if not all) counties so ensure you keep supporting documentation organized and do not commingle funds.

Stay Organized!



- Every recipient is different, but staying organized will position you for success.
- Recommend one binder per grant (SHSGP, EMPG, etc.)
 - Applications
 - Award Documents
 - Budget
 - Reimbursements/disbursements
 - Reports
 - Correspondence
 - Other pertinent information

Reconciliation and Closeout



- Final reimbursement and quarterly reports must be submitted by July 31, 2021
- Must submit a Closeout Status Report by August 15, 2021
- Must maintain grant files for a minimum of five (5) years from the date of closeout



WebGrants - Timeline



- All Applications Approved in WebGrants
- Status Reports & Claims available to start



WebGrants – Timeline Cont.



1st & 2nd Quarter Status Reports, Claim Requests & other necessary documentation are due in WebGrants by July 15, 2020



3rd Quarter Status Reports, Claim Requests & other necessary documentation due in WebGrants by October 15, 2020



4th Quarter Status Reports, Claim Requests & other necessary documentation due in WebGrants by January 15, 2021

WebGrants – Timeline Cont.



5th Quarter Status Reports, Claim Requests & other necessary documentation are due in WebGrants by April 15, 2021

6th Quarter Status Reports, Claim Requests & other necessary documentation due in WebGrants by July 31, 2021

Closeout Status Report due by August 15, 2021

EMPG Status Report Guidelines



- **Subrecipients are required to prepare and submit quarterly status reports utilizing the Status Report component in WebGrants.**
- **Status reports can assist subrecipients as a self-assessment to ensure that time schedules are being met and investment justification goals are being achieved.**
- **SEMA will use the reports to monitor the financial and programmatic progress of the projects and to comply with federal reporting.**

EMPG Status Reporting Guidelines



- **Status Reports must be based on the approved EMPG Statement of Work and are due no later than July 15, October 15, January 15, April 15 and July 31.**
- **EMPG subrecipients are required to report quarterly on progress towards completing activities and projects approved in the Statement of Work as well as progress made towards implementing 2020 EMPG Baseline Requirements.**

Why do we request this information?



- **Federal agencies as well as Emergency Management organizations regularly ask for the benefit of the program.**
- **If you have followed the current congressional discussions, you will notice that sustainment grants are a hot topic.**
- **Your status report is only one small piece of a very large puzzle. This puzzle comes together in a big picture of how great the grant is for our state. If you only report on the absolute minimum, that is what SEMA has to report to the federal partners. It is to your benefit that you expand the value that the grant funding has on your agency.**

Equipment/Property Control



- A control system must be developed to ensure adequate safeguards to prevent loss, damage or theft of the property.
- Any loss, damage or theft shall be investigated.
- Adequate maintenance procedures must be developed to keep the property in good condition.
- Subrecipients should immediately update their equipment inventory records with regard to operational readiness and condition.
- Equipment purchased with Federal Funds should have a label attached stating, "Purchased with DHS funds," or the respective federal funds used to purchase the equipment.
- Equipment purchased through EMPG needs to be entered into SalamanderLIVE.

Equipment/Property Control



- Reference – 2 CFR 200, section 200.313, Subpart d, Equipment
 - Property records must be maintained.
 - A physical inventory must be taken at least once every two years.
 - A control system must be developed to ensure against loss, damage or theft of the property.
 - Adequate maintenance procedures must be developed.
 - Proper sales procedures must be established.

Equipment/Property Control



- Reference 2020 EMPG Program Manual –

III. Equipment Inventory, Equipment Inventory Form

Emergency Management Performance Grant (EMPG) applicants are required to submit an inventory of equipment they have purchased with EMPG funding at time of application on each even numbered calendar year (2016, 2018, 2020, etc.) Applicants must complete the Equipment Inventory Form, within the DPS WebGrants online portal, for newly purchased equipment in order to receive reimbursement through the EMPG. It is the responsibility of the subrecipients to maintain an updated inventory of equipment for items purchased with EMPG funds.

Equipment/Inventory Continued



- SEMA has added an “Equipment Inventory” form to each claim.
- You only complete this form if you purchased equipment in the quarter you are requesting reimbursement for.
- A complete inventory of EMPG funded equipment should be maintained using the “Inventory Spreadsheet” located on the SEMA Webpage at <https://sema.dps.mo.gov/programs/empg>

Equipment/Property Control



- **A subrecipient may have an established capitalization amount, which defines the per-unit cost of equipment. If the agency's capitalization level is higher than the states definition, the subrecipient must follow the more restrictive.**

**The state definition for equipment is as follows:
tangible, nonexpendable, personal property having a
useful life of more than one year and an acquisition cost
which equals or exceeds \$1,000 or more per unit.**

Disposition of Equipment/Property



When original or replacement equipment acquired with Federal Funds is no longer needed for the original project or program, the equipment may be retained, sold or disposed, if it is not needed in any other Federally sponsored project or program. The following are the procedures to eliminate any equipment item from the inventory:

- The subrecipient must obtain written (e-mail) approval from SEMA prior to disposing of any equipment purchased with federal funds.**
- Equipment with a per item fair market value of less than \$5,000 may be retained, sold or disposed with no further obligation to the awarding agency.**
- Equipment with a per item fair market value of \$5,000 or more may be retained or sold. If sold, the awarding agency (SEMA) shall have a right to the fair market value proceeds from the sale of the equipment.**
- Documentation describing the disposal of equipment must be maintained in the subrecipient grant file.**

Claim Request



Claim Request- Cont.



- Required to be submitted quarterly, at a minimum
- May be submitted as frequently as desired by sub-recipient
- SEMA preference is monthly submissions

Claim Request for Personnel



- WebGrants Claim Request
- Invoice (example: temporary clerical support/invoice)
- Proof of Payment (i.e., copy of check or payroll journal)
- Timesheet(s) **Note: Timesheets for all personnel paid with federal funds must be certified showing percentage supported by EMPG.**

Timesheets



- The monitoring specialist has found that timesheets are being completed incorrectly.
- People have shown they have worked every holiday all year. If you did not work, do not put any hours under the main 2 columns.
- Any leave taken should be shown on the right hand columns.
- Timesheets are certifying you have worked exactly what you have put down. Please do your best to be accurate in reporting time and effort. It is perfectly fine for percentages to fluctuate from month to month.

Claim Requests for Contracts

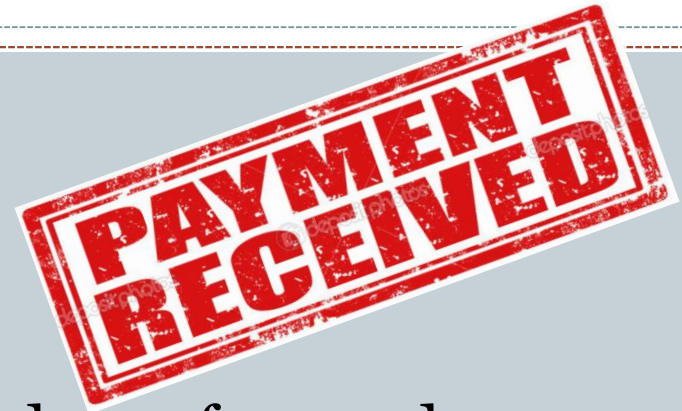


- WebGrants Claim Request
- Proof of Payment (i.e., copy of check or credit card statement)
- Contract must be uploaded into WebGrants (Other Attachments component) when requesting your first reimbursement
- Any other documents required by the contract (i.e. milestone reports, time and effort)

Claim Requests for Supplies/Operations



- WebGrants Claim Request
- Invoice
- Purchase Order, if one was created or referenced on an invoice
- Proof of Delivery (i.e., signed packing slip, receipt or statement in writing indicating the item has been received)
- Proof of Payment (i.e., copy of check or credit card statement and copy of check to pay credit card)



Claim Requests for EOC Equipment



- WebGrants Claim Request
- Invoice
- Purchase Order, if one was created or referenced on an invoice
- Proof of Delivery (i.e., signed packing slip, receipt or statement in writing indicating the item has been received and inventoried)
- Proof of Payment (i.e., copy of check or credit card statement and copy of check to pay credit card)
- Inventory Form completed

Reimbursement for Travel



- WebGrants Claim Request
- Expense Report or Invoice
- Proof of Payment (i.e., copy of check or credit card statement and copy of check to pay credit card)
- Agenda/Announcement
- Proof of attendance (i.e., participant sign-in sheet or roster, certificate)
- January through June mileage- \$0.43, July through June, 2021- \$0.37

Claim Request WebGrants – cont.



- Enter each expense against appropriate budget line in the ‘Expenditure Claim Form’ component
- Upload required documentation in ‘Other Attachments’ component in the Claim Form.
- Mark all forms as complete and submit by deadline.

Subaward Adjustments



- Complete a subaward adjustment as your needs change from the original approved budget.
- If line items max out, submit a subaward adjustment and move money from one line item to another.
- If you do not do a subaward adjustment, you may be losing out on money.
- In FY15, SEMA did some contract adjustments for locals, which resulted in reimbursement of \$46,000 that otherwise would not have been paid.

Subaward Adjustments



- Submit a subaward adjustment in WebGrants.
- Tell what line items need to be changed, how much needs to be moved, and why the subaward adjustment is needed.
 - Example: Agency X was hoping to purchase a new printer in FY20, but the Director's laptop crashed and would now like to allocate funds for a new laptop instead of a printer. Agency X would like to move \$800 from "Other: Printer" line item to "Other: Laptop" line item.

Subaward Adjustment Cont.



- Subaward adjustments can not change the purpose of the program.
- If SEMA would not have approved it at time of application, SEMA will not allow it during an adjustment.
- Subaward adjustments must be approved by SEMA before purchase or change is implemented at the local level.

Helpful Hints with Grants!



- Cannot reimburse sales tax
- Rounding in WebGrants- locals take the extra penny
- Watch your budget lines
- You may do a Subaward Adjustment up until June 1st, 2021
- If you did not ask for it in your application, you cannot ask for reimbursement without a subaward adjustment.
- Costs must be “Allocable” to grant- pro-rate

Award



Your award is to be signed by the Authorized Official and returned to SEMA no later than August 25th, 2020.

If the award is not in on time, the funds will be deobligated.

Two copies are in your folder, one for us and one for your file. Only send one signed copy back to us.

Financial Admin. Guide



- Your folder contains SEMA's EMPG Financial and Administrative Guide.
- It is vital you read and review this document.
- One important change is that invoices older than 6 months will not be reimbursed, with the exception of January because you submit 6 months at once.
- Do not hold expenditures occurred throughout the entire year and submit on the last claim.

EMPG Contact Information



Amy Lepper
EMPG Program Manager
573.751.0788
amy.lepper@sema.dps.mo.gov

Jackie Hofstetter
EMPG Grant Specialist
573.526.9256
jackie.hofstetter@sema.dps.mo.gov

Holly Otto
EMPG Grant Specialist
573-751-3401
Holly.Otto@sema.dps.mo.gov

Questions

