



The Grants Gazette

Ohio EMA's Preparedness Grants Updates

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SUBGRANTS

44 Code of Federal Regulations 13.37 Subgrants

Are you correctly providing funds to other governmental agencies to purchase equipment or services?

Definition of Subgrant: Award of financial assistance in the form of money, or property in lieu of money, made under a grant by a grantee to an eligible sub grantee. The term includes financial assistance when provided by contractual legal agreement.

In accordance with your Ohio Emergency Agency Grant Agreement and the State Homeland Security Guidance, no sub-grantee may sub-grant funding to another entity without prior coordination and approval from the Ohio Emergency Management Agency, Preparedness Grants Branch. In order to be granted permission to sub-grant, the managing jurisdiction will have to demonstrate an ability to ensure compliance with all terms, conditions and requirements of the federal grant guidance.

If approved to subgrant by Ohio EMA, all grantees shall follow the provisions which are applicable to awarding agencies when awarding and administering sub grants (whether on a cost reimbursement or fixed amount basis) of financial assistance to local governments. Grantees shall:

- ◆ Ensure that every sub grant award includes a provision for compliance with 44 CFR, 13.37 Sub grants.
- ◆ Ensure that every sub grant includes any clauses required by Federal statute and executive orders and their implementing regulations.
- ◆ Ensure that subgrantees are aware of requirements imposed upon them by Federal statutes and regulations.

Procurement Best Practices

Set Up a Record System for Each Grant

Make sure that you have a system established that will maintain your grant records accurately and securely while still being accessible. All Federal awards are subject to a possible audit or desk review.

Maintain Written Procurement Procedures

Become familiar with and keep on file the written procurement procedures and standards for your organization. If you are unsure, check with your local or state government for procedures. All grantees must have procurement procedures that follow local or state procurement procedures AND meet Federal procurement law as outlined in 44 Code of Federal Regulations (CFR) 13.36.

Avoid any Real or Apparent Conflicts of Interest in Your Procurements.

Remember that no employee, officer, or agent of your organization, who has a real or even apparent conflict of interest (potential for personal gain), may participate in the selection of the contractor or vendor that will supply the grant-funded items or services. They cannot accept gifts, favors, or anything of monetary value from potential contractors.

Draft a Solicitation that Encourages Competition by Not Using Proprietary Vendor Specifications.

By avoiding the use of proprietary vendor specifications, you encourage competition, which may decrease your overall costs. For example, you can request bids for a new pumper and specify that it have an "independent front suspension." But specifying that the pumper have a particular name-brand independent front suspension would be a proprietary specification that would limit competition to those vendors that build trucks containing those particular items.

Important Dates

- ◆ Completion of on-line Bi-annual Strategy Implementation Report (BSIR) is due **February 12, 2013** from the sub grantees.
- ◆ Performance period ends **March 31, 2013** for the FY 2010 HSGP-SHSP and SHSP-LE grant.

HSGP Grant Expenditures

As of January 30, 2013

Grant	Award	Expended	Remaining
FY 2010	\$40,769,989	\$13,850,194	\$26,919,795
FY 2011	\$20,499,771	\$1,570,847	\$18,928,924