



OHIO DEPARTMENT
OF PUBLIC SAFETY
EDUCATION • SERVICE • PROTECTION

Ohio Emergency Management Agency

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Admin Plan for DHS Grants



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U.S. Department of Homeland Security, Federal Emergency Management Agency, National Preparedness Directorate



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Ohio EMA (State Administering Agency), Grants Division, Grants Branch Administrative Plan, October 2007

for grant programs awarded via the U.S. Dept. of Homeland Security (DHS)

I. PURPOSE

Overview – The US Department of Homeland Security (DHS) awards various Homeland Security (HS) grants to enhance and develop state and local homeland security capabilities. These HS grants are administered by single State Administering Agency (SAA). In Ohio, the Governor has designated Ohio Emergency Management Agency (EMA) as the SAA. Ohio EMA subsequently sub-grants the HS grants to the various state and local jurisdictions and/or agencies. This Plan establishes the administrative process by which Ohio EMA will administer the HS grants awarded to Ohio. This Plan will include processes to apply for, receive, manage, and closeout HS funds that are sub-awarded to state and local jurisdictions and/or agencies, private or public.

Each federal HS grant comes with a specific grant “Program Guidance and Application Kit.” The Program Guidance defines/establishes that grant program’s unique initiatives, requirements, and restrictions to include specific allowable and non-allowable costs and activities. Ohio EMA will ensure state and local jurisdictions and/or agencies receiving these funds will comply with the respective federal grant guidance. It must be recognized that the federal grant programs differ from year to year, and as such the allowable and non-allowable costs and activities differ from grant to grant. Grant recipients are responsible to review and adhere to the specific grant Program Guidance to understand its unique requirements and restrictions.

Further, DHS recognizes and permits the SAA direct or specify how grant funds will be allocated and used provided that direction it is not inconsistent with federal grant guidance or federal regulations. The SAA may impose guidelines and parameters more strict or limited than federal guidance, but may not broaden those more than permitted by the federal guidance. As such, Ohio EMA may issue its own specific grant Program Guidance that defines/establishes that unique state initiatives, requirements, and restrictions to include specific allowable and non-allowable costs and activities. Ohio EMA will ensure grant recipients are aware and will comply with the state grant guidance.

Additionally, basic federal laws and rules govern the administration and spending of federal grant funds. These requirements are defined in the Code of Federal Regulations (CFRs), Office of Management & Budget (OMB) Circulars, and respective federal agency financial guides. Ohio EMA will ensure grant recipients are aware of and can comply with these federal regulations. However, the individual grant recipient is responsible to review, understand, and adhere to those federal regulations.

If there is a question regarding eligible grant activities or costs, or with state or federal guidance, the grant recipient will contact Ohio EMA for clarification. If Ohio EMA is unclear or uncertain on how to address or answer the grant recipient’s request for clarification, Ohio EMA will contact their respective DHS Program Officer for clarification. Clarification will be relayed to all parties concerned in a timely fashion.

Ohio EMA, as the SAA, is responsible for managing the day-to-day operations of grant and sub-grant supported activities. However, it is recognized that other sections/personnel within Ohio EMA and Ohio HS Division have trained and experience personnel who will manage

specific tasks under the grant programs. Those staff personnel will be responsible to monitor grant recipient activities and assure compliance with applicable state and federal requirements. The following Ohio EMA and/or HS personnel will administer these current/open grant programs in coordination with the Ohio EMA Grants Branch.

- i. State Homeland Security Program (SHSP):
 - a. County and Regional programs: Ohio EMA Grants Branch
 - b. State Agency programs: Ohio EMA Grants Division
 - c. Strategic Development: Ohio EMA Operations Division and Ohio HS Domestic Preparedness Division
- ii. Urban Areas Security Initiative (UASI):
 - a. Program activities: Ohio EMA Grants Branch
 - b. Strategic development: Ohio EMA Operations Division and Ohio HS Domestic Preparedness Division
- iii. Law Enforcement Terrorism Prevention Program (LETPP):
 - a. Program activities: Ohio EMA Grants Division and Ohio HS Domestic Preparedness Division
 - b. BSSA Communications project: Ohio EMA Communications Branch
- iv. Metropolitan Medical Response System (MMRS): Ohio EMA Grants Branch
- v. Citizens Corp Program (CCP): Ohio EMA Operations Division-Plans Branch
- vi. Emergency Management Performance Grant (EMPG):
 - a. County EMA programs: Ohio EMA Field Operations Section
 - b. County Special Projects: Ohio EMA Technical Support Division
 - c. Ohio EMA programs: Ohio EMA Executive Office
- vii. Buffer Zone Protection Program (BZPP): Ohio HS Critical Infrastructure Section
- viii. Transit Security Grant Program (TSGP): Ohio EMA Grants Branch
- ix. Commercial Equipment Direct Assistance Program (CEDAP): Ohio EMA Grants Branch
- x. Homeland Defense Equipment Reuse (HDER) program: Ohio EMA Radiological Branch
- xi. All grant exercise program activities: Ohio EMA Exercise Section
- xii. All grant training program activities: Ohio EMA Training Section
- xiii. All fiscal activities: Ohio Dept of Public Safety's Fiscal Office
- xiv. All audit-monitoring program activities: Ohio EMA Grants Division, Ohio EMA Atty General representative, and Ohio Dept of Public Safety's Internal Audit Section

The Ohio Dept of Public Safety's Fiscal Administration Division will support the Ohio EMA Grants section thru their Fiscal Office and Internal Audits Section. The Fiscal Office will manage the receipt, accounting, payout and reconciliation of all federal grant funds. The Internal Audits Section will provide technical assistance in the review or completion of grant recipient monitoring activities and assist in the coordination of state and federal audits of the federal grant programs.

II. APPLICABLE REFERENCES & AUTHORITIES

Federal Grant Program Guidance:

See the respective federal grant guidance issued for each grant

Federal Award and Special Conditions:

See the respective federal Grant Award Notice (GAN), to include any Special Conditions annotated on the GAN

Federal Financial Guides: (as amended/revised)

Dept. of Justice (DOJ), Office of Justice Programs, Office of Comptroller, “**Financial Guide**”, **December 2006 ed.** (applicable to HS grants issued prior to and including FY05)

Dept. of Homeland Security (DHS), Office of Grant Operations, “**Financial Management Guide**”, **January 2006 ed.** (applicable to HS grants issued in FY06 and thereafter)

Code of Federal Regulations (CFR): (as amended/revised)

Title 28, Part 66, DOJ (on behalf of DHS) “Uniform Administrative Requirements for Grants and Agreement to State and Local Governments”

Title 44, Part 13, FEMA, “Uniform Administrative Requirements for Grants and Agreement to State and Local Governments”

OMB Circulars: (as amended/revised)

Grant Administration Requirements:

A-102 “Grants and Cooperative Agreements with State and Local Governments” (codified in 28 CFR 66 [DOJ-DHS] and 44 CFR 13 [FEMA]).

A-110 “Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations” (codified in 28 CFR 70).

Allowable/Non-allowable Cost Principles:

A-21 “Cost Principles for Educational Institutions” (codified in 28 CFR 66, by reference).

A-87 “Cost Principles for State, Local, and Indian Tribal Governments” (codified in 28 CFR 66, by reference).

Audit Requirements:

A-133 “Audits of States, Local Governments and Non-Profit Institutions” (codified in 28 CFR 66 & 70 and 44 CFR 14, by reference).

Ohio Grant Program Guidance:

See the respective federal grant guidance issued for each grant

Ohio Revised/Administrative Code (as amended/revised)

RC 5705.42, Grants by United States government.

RC 149.433, Exemption of security and infrastructure records.

III. FREEDOM OF INFORMATION -

Ohio EMA recognizes that much of the information submitted in the course of applying for funding under DHS grant programs, or provided in the course of its grant management activities, may be considered law enforcement sensitive or otherwise important to national security interests. This includes threat, intelligence, risk, capability, and/or needs assessment information, as well as discussions of response, government, demographic, transportation, public works, industrial, and/or public health infrastructures.

This information may be considered Infrastructure or Security records and not released IAW Revised Code section 149.433. All determinations concerning the release of information made pursuant to the Freedom of Information Act, 5. U.S.C. §552 (FOIA) will be made on a case-by-case by Ohio EMA. All such requests will be forwarded to and coordinated by Ohio EMA Public Information and in consultation with at a minimum Ohio EMA's Attorney General Representative and the Grants Administrator, Branch Chief, and/or Grants Division Director.

IV. GRANT MANAGEMENT-ADMINISTRATION –

This will be accomplished in three distinct phases: Pre-Award, Active Grant Program Period, and Post-Award. The following identifies the processes for each phase of grant management.

PRE-AWARD PHASE - This Phase begins once the DHS announces that a new grant opportunity exists, continues thru the federal grant application, and concludes with approval of state, local, and/or regional grant applications.

A. Initial Grant Review

1. The Grants Branch will secure information related to grants being made available from DHS. The Grants staff will identify the grant's potential function/use and identify of those state and local agencies that will be supported by the grant. Grants staff will brief the Grants Division Director and Executive Director on the grant scope, purpose, eligibility and likely recipients.
2. The Grants Division Director will identify a Core Group of Ohio EMA and HS program staff that will/may be needed to complete the initial grant application and will administer the eligible program activities within the grant. Grants Staff will provide the Core Group copies of the Federal Grant Program Guidance and any supporting program documents or information. The Division Director will facilitate a meeting of the Core Group to review and establish the grant's program requirements, to include but not limited to:
 - a. Review amount of funding available,
 - i) Determine what funding, if any, must be allocated to given entity or for a specific purpose,
 - ii) Identify matching fund requirements,
 - b. Determine allowable and unallowable program activities and costs,
 - c. Determine National or State Goals that must versus could be supported by the program,

- i) Prioritize which Goals must be accomplished first, second, third, etc, to include what levels of funding must be directed to each,
 - ii) Identify allowable activities/costs that the State wishes to NOT support in this grant, and
 - d. Outline the eligible and non-eligible grant recipients,
 - i) Identify the requirements for a minimum pass-thru of funds to local recipients (ie. 80%),
 - e. Determine the whether to distribute funds based on a formula or competitive application.
 - i) Identify what, if any, funds will be awarded to and spent by the State on behalf of local jurisdictions, and
 - ii) Determine what agencies/associations can/will sign a MOU authorizing the State spending on behalf of local jurisdictions,
3. Determine what information or deliverables are necessary to complete the grant application, and designate what staff will complete this process,
4. Determine what information or tasks are necessary to award and subsequently administer the program to the grant recipients, and designate what staff will complete this process.

B. Federal Grant Application

1. The Ohio EMA Grants Branch Chief will oversee and coordinate the grant application process. The Grants Branch Chief will ensure pre-application steps have been taken to permit access to and completion of the online grant application (ie. obtain DUNS # or password to secure website).
 - a. Personnel designated during the Initial Grant Review will gather information and develop any reports/data required for the grant application, and provide that data directly to the Grants Branch Chief NLT 10 business days prior to the grant application deadline.
 - b. The Branch Chief will present this to the Grants Division Director for review and approval, and then to Executive Director for review and approval. If necessary, the Executive Director will obtain approval of the application from the DPS Director and Governor's office.
2. Grants staff will make any necessary changes to the application materials, and then submit the application as directed in the Federal Grant Program Guidance.
 - a. The Grants Branch Chief will ensure the grant application is completed on/before its defined deadline. Copies of the grant application will be maintained by the Grants Branch Chief.
 - b. The Grants Division Director and Executive Director will be advised when the application is complete.
3. The Grants Branch Chief will keep the Federal Program Officer informed as to the progress or problems encountered in developing or submitting the State's grant application.

C. Grant Recipient Pre-Award Administration

1. Identify Grant Allocations

- a. The Initial Grant Review will define the amount of funding (by total or percentage) to be available to eligible state, local, and regional applicants as well as the method by which the funds will be allocated (by either a formula or competitive process).
 - i) For funds allocated by **formula**, Grants staff will develop a formula by which each eligible participant receives a specified amount of funding. The Executive Director will provide the factors that will be contained in the formula. Grants staff will provide the formula for review and approval to the Executive Director via the Grants Branch Chief and Division Director. Once
 - ii) For funds allocated by a **competitive** process, the Executive Director will identify the range and/or maximum amount of funds that any one eligible grant participant may submit for in their application. The Executive Director will determine the parameters by which eligible applicants will submit projects for funding consideration.
- b. The method by which funds are to be allocated and awarded, will be clearly defined in the grant guidance issued to eligible participants.

2. Identify Eligible Grant Applicants.

- a. Grants and Programmatic staff will identify the likely grant applicants (e.g local, regional, and state). The likely applicants will be those entities, jurisdictions, or departments best suited to accomplish the programmatic goals of the federal grant and federal priorities. Grants staff will make a final recommendation on eligible applicants to the Executive Director for approval.
 - i) Should the grant program require a minimum pass-through of funds to local entities, the staff will ensure those minimums will be met before the recommendation is given to the Executive Director.
- b. Ohio EMA may choose to not to offer or accept applications from those entities that are considered to be “High Risk” applicants. An entity may be considered “high risk” if Ohio EMA determines that the potential grant recipient:
 - i) Has a history of unsatisfactory performance, or
 - ii) Is not financially stable, or
 - iii) Has a management system which does not meet the management standards set forth in this part, or
 - iv) Has not conformed to terms and conditions of previous awards, or
 - v) Is otherwise not responsible.
 - vi) Grants staff will identify and brief the Grants Division Director of any entity that should be considered “high risk” and provide such documentation that supports the cause (as defined above). The Grants Division Director, with concurrence of the Executive Director, will not offer the grant opportunity to the entity or will offer the entity the grant opportunity but apply special conditions/restrictions to the entity’s grant award (if approved). Grants staff will notify the entity wishing to participate but considered “high risk” as early as possible in the grant application process of:
 - vii) The nature of any special conditions/restrictions that may be imposed upon them;
 - viii) The reason(s) for imposing conditions/restrictions;
 - ix) The corrective actions and the time allowed to address/resolve the imposed condition/restriction; and

- x) The method of requesting reconsideration of the conditions/restrictions imposed, and subsequent removal of the designation as “high risk”.
- c. Ohio EMA will also not issue any grant funds to any potential recipient which is debarred, suspended, or otherwise currently excluded from or ineligible to receive state or federal grant funds. Prior to issuing grant applications or developing grant allocations, Grants staff will review the following sites to determine those persons/agencies for which findings exist and have not been resolved, and thus should not participate in the grant program.
 - i) Auditor of State’s “Findings for Recovery Database”, www.auditor.state.oh.us/StateAgencies/FFR/Default.htm
 - ii) General Services Administration’s “Excluded Parties List System”, www.epls.gov

3. Develop-Issue Grant Application-Program Guidance

- a. As an outcome of the Initial Grant Review, designated grants/program staff will develop grant application and program guidance that is sufficient for the eligible participants to apply for the respective grant funding. The guidance will define at a minimum the eligible and non-eligible program activities and the eligible and non-eligible costs.
 - i) The initial guidance will be developed w/in thirty (30) days of the Initial Grant Review meeting. It will include forms necessary to submit a “paper” application or to use as an outline to complete an “online” application.
 - (1) If the grant applications are to be competitive, grants/program staff will also develop an evaluation methodology by which the applications are to be approved or denied. This methodology will be submitted for review and approval along with the grant guidance. The criteria will identify:
 - (a) What information is to be evaluated and how,
 - (b) What personnel, sections, and/or agencies will be responsible for the evaluation,
 - (c) The timeframe in which applications will be reviewed and ultimately accepted or rejected, and
 - (d) How eligible participants will be told their applications are accepted or rejected (in whole or part).
 - ii) The development of the draft guidance will be coordinated by Grants Staff working directly with the respective program offices that will ultimately administer portions of the grant program’s allowable activities. Grants staff will forward a final draft for review and adoption by the Executive Director.
 - (1) The Executive Director, may as required, obtain final approval from the DPS Executive Director and/or Governor’s office before issuing the guidance to eligible grant participants.
 - b. Guidance will be issued to eligible grant participants to provide ample time to develop and submit grant applications. Participants should have at least thirty (30) days in which to complete their applications, but the timeframe may be compressed if required to meet federal deadlines.
 - i) Grant application deadlines may vary for state, local and regional applicants in order to facilitate development and evaluation of the applications.

- ii) The Grants Division Director, with Executive Director approval, will establish the appropriate deadlines for grant application submission of eligible state, local and regional participants.
- iii) Waivers to the deadline will only be given and approved by the Grants Division Director with the concurrence of the Executive Director.

4. Evaluate Grant Applications

- a. Grants staff will receive applications and provide a cursory review and ensure completeness and content of the application packet.
 - i) Staff will contact eligible grant recipient should any forms/attachments be missing from the application.
 - ii) Clarifications of applications may be made with the submitting entity, but no changes will be made after the grant deadline.
- b. Grants staff will compile a list showing each entity that has in fact submitted an application prior to but not later than the application deadline. Applications received after the deadline will be noted and filed, but will not be included for evaluation.
- c. The Grants Branch Chief will establish the meeting date/time/location during which applications will be evaluated and which grants-program staff will participate in the review.
 - i) Grants staff will make a final list of applicants as well as copies of each application for review in accordance with the evaluation guidance applicable to the grant.
 - ii) At a minimum, Grants and Program staff will confirm all costs are eligible IAW with federal grant program guidance:
 - (a) Equipment costs must be IAW with Authorized Equipment List (AEL) specified for the grant with a clear nexus to homeland security and/or dual-use for all-hazard preparedness and response; and
 - (b) General costs (e.g. Personnel, Travel) under Planning, Organization, Training, Exercise, and Administration will also be evaluated as needed against the cost principles found in OMB Circular A-87.
- d. Grants and program staff will determine which applications are accepted in whole, which are to be funded in part, and those not to be funded. Staff will identify and document the reasons as to why project costs were determined to only be funded in part or not funded.
- e. Staff will complete evaluations so that all funding can be fully committed to eligible grant recipients. Final funding allocations will then be briefed thru the Grants Division Director to the Executive Director for final concurrence on funding allocations.
- f. Once final allocations are determined, Grants staff will:
 - i) Coordinate with Fiscal and Program staff to develop grant packages for those entities whose applications were accepted; and
 - ii) Draft letters, for the Executive Director's signature, to those entities who application was not accepted to include the reason(s) why their application was rejected in part or whole.

5. Internal OEMA Budget Development

- a. As a final step within the pre-award phase, Ohio EMA will develop its own budget and grant application that identifies what grant funds will be used by the Agency to complete and fund eligible activities IAW the grant. This will not include costs

allocated to individual Grant Recipients unless the Agency is authorized to spend those funds on behalf of a state or local jurisdiction.

- b. The Grants Branch Chief will coordinate the budget development and subsequent application, but individual activities and costs will be scripted by the respective Division Directors and their program staff as follows:
 - i) Grants Division Director will define the budget and activities to be accomplished by staff under the Administration portion of the grant, to include staff costs, overtime, travel, office supplies and equipment, meeting-conferences costs, and other approved grant cost categories. This will include eligible costs from the Fiscal office in coordination with Tech Support Division Director.
 - ii) Operations Division Director will define the budget and activities to be accomplished by staff under the Planning, Training and/or Exercise portions of the grant to include the eligible grant costs.
 - iii) Tech Support Division Director will define the Administrative costs necessary to support eligible Fiscal costs and coordinate that thru the Grants Division Director for inclusion into the budget. The TS Division Director will also coordinate with the Operations Division Director to identify and define the eligible Equipment costs. The Directors will consult the appropriate Authorized Equipment List to ensure equipment costs are allowed under the grant.
- c. The Grants Branch Chief will submit the Agency's budget and grant application in the same timeframe and format as required of the other state agencies.

ACTIVE GRANT PROGRAM PERIOD – This phase starts with the acceptance of the federal award and issuance of Grant Recipient awards. It includes the accomplishment of program activities, reimbursement of funds for those costs, and submission of grant reports throughout the approved grant performance period, to include any extensions to that period.

A. Acceptance of the Federal Award-Special Conditions

1. DHS will issue an initial Grant Award to Ohio EMA (as the SAA). The Grants Staff will review the Award, and confirm the funding total and the award/fiscal performance period.
 - a. Staff will also identify any 'Special Conditions' that must be addressed before the respective funds are expended. Grants staff will determine what actions and staff/agencies are needed to address and resolve any Special Condition.
2. The Grants Branch Chief will brief the Grants Division Director and Executive Director on the Award, to include the applicable steps needed to address/resolve any Special Conditions. The Executive Director will concur on actions needed to resolve the respective Special Conditions, and then sign and initial the Award as directed.
3. The Grants Branch Chief will then:
 - a. Return the signed copy of the Award to DHS,
 - b. Provide signed copies to DPS Fiscal office,
 - i) Fiscal will use the Award to make appropriate commitments in EMA/State budget and establish accounting lines for grant programs and for Grant Recipients.
 - c. Provide signed copies to OEMA Grants Branch staff,
 - d. Provide signed copies to other applicable OEMA or OHS sections that will administer specific portions of the grant program,

- e. Provide copies to DPS Internal Audit section.
4. The Grants Branch Chief will coordinate with respective staff/agencies on Special Conditions and the actions needed to address/resolve those Conditions.
 - a. The defined staff/agencies will complete tasks needed to resolve the Conditions and provide the Grants Branch Chief the data necessary to document that the Conditions are addressed.
 - b. The Grants Branch Chief will forward this supporting documentation to DHS for subsequent removal of the Special Conditions.
 - c. DHS will issue a Grant Adjustment Notice (GAN) showing the Special Condition was removed. The Grants Branch Chief will provide copies of the GAN with the same groups as noted in item 3. above.

B. Issuance of Grant Recipient Notice of Awards

1. The state has sixty (60) days to obligate and make available the funding from the federal award available to the respective Grant Recipients.
 - a. For awards based on formula allocations, this obligation will be satisfied by issuance of a Notice of Award (NOA) to each respective Grant Recipient.
 - b. For awards based on competitive application, this obligation will be satisfied by establishing how much is to be awarded via the competitive process, and initiate the competitive application process before or within the sixty-day window. Funds will then be awarded promptly following the review of grant applications as discussed previously.
2. Grants will provide Fiscal a list of each grant recipient to be funded under the given grant program. Fiscal will in turn create commitments within the state accounting system for those funds and create individual grant agreement numbers for each recipient. Fiscal will provide those numbers to Grants for issuance of grants Notice of Award.
3. Grants Branch will create and issue via the Executive Director, a Notice of Award packet to each grant recipient. The packet will include all pertinent information regarding the grant including, but not limited to administrative requirements, fiscal requirements, deadlines, and reports.
 - a. Cover letter acknowledging the issuance of the grant award;
 - b. Notice of Award and Grant Agreement which serves as the commitment for the issuance, receipt, and use of federal grant funds between Ohio EMA and the grant recipient. The Notice of Award will include at a minimum the following information:
 - i) Appropriate award total and grant performance period;
 - ii) Summary of clauses or restrictions specified in the state or federal grant program guidance;
 - iii) Any Special Condition specified in the federal award that is applicable to a Grant Recipient;
 - iv) Appropriate references to applicable federal grant regulations or rules (ie. CFR, OMB, etc);
 - v) Appropriate grant reporting requirements; and
 - vi) Appropriate contact information for grant programmatic and fiscal support.
 - c. Federal Assurance forms to include a Lobbying disclosure form;

4. If Ohio EMA determines to issue an award to a “high risk” Grant Recipient, special conditions and/or restrictions shall be included in the award and monitored by Grants staff. The special conditions/restrictions may include:
 - a. Completion and submission of corrective administrative actions needed resolve any fiscal or programmatic issues;
 - b. Submission of bid and procurement documentation before purchase orders are made or contracts issued;
 - c. Conduct of more frequent project monitoring throughout the program period;
 - d. Requiring additional, more detailed financial/programmatic reports;
5. Grant Recipient will acknowledge their consent and willingness to participate in the grant and comply with the requirements of the program by signing and returning those materials identified in the Notice of Award and Grant Agreement packet. The materials are to be returned via general mail (or special delivery, and not via fax or email) to the attention of the Grants Branch.
 - a. Grants staff will validate the completeness of the submitted materials, and notify the grant recipient, via phone or email, that either a complete package was received or advise them of any materials missing and that must still be submitted.
 - b. Grants staff will provide Notice of Awards for completed packages to the Executive Director for signature. Copies of the signed Awards will then be returned to the Grant Recipient. Originals will be maintained in the grant recipient’s master file.
 - c. Grant Recipients will not incur any programmatic costs until the copies are received.

C. Grant Recipient Activities

1. **Upon receipt of the signed Award from Ohio EMA**, Grant Recipient will immediately begin programmatic activities as defined in their approved grant application and reflected in their approved budget. Grant recipients will endeavor to complete all grant activities and make final requests for cash in their defined grant program period. Grants/Program Staff will assist Grant Recipients in the accomplishment of their grant projects and ensure compliance with grant requirements.
2. **Budget/Project Changes.** Grant Recipients are permitted to make budget and/or project changes to their approved grant projects.
 - a. Changes to the program include:
 - i) Any revision of project scope or objectives (regardless of whether there is an associated budget revision requiring prior approval), or
 - ii) Any addition or deletion of budget item costs, or
 - iii) Any increase or decrease in total item cost by more than 10%.
 - b. Grant program changes shall require the prior written approval of the appropriate Ohio EMA Grants/Program staff. Grant recipients requesting a change will provide written notification to include:
 - i) A cover letter that clearly identifies the requested change to include reasons justifying the change and certification that all changes are in compliance with grant program guidelines;
 - ii) A revised Program Narrative and/or Budget Worksheet (as applicable);
 - iii) Other supporting documentation justifying the requested budget change.

- c. Ohio EMA recognizes that events may occur that have significant impact upon the Grant Recipient's supported activities-costs. In such cases, it is the Grant Recipient's responsibility to inform Ohio EMA as soon as the following types of conditions become known and will result in changes to the Grant Recipient projects or budgets.
 - i) Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation.
 - ii) Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more beneficial results than originally planned.
- d. The appropriate Grants/Program staff will promptly review and act upon such requests. Staff will approve a budget or project revision, in part or in whole, which is consistent with the following:
 - i) Terms and conditions of the grant program and award notice;
 - ii) Local jurisdiction's or entity's homeland security strategy;
 - iii) State-directed grant program priorities to include meeting one or more goals and objectives of the State Homeland Security Strategy; and
 - iv) Federally-directed grant program priorities.
- e. If in doubt whether or not a revision properly adheres to the grant guidelines, staff will ask for further clarification from the Grant Recipient and/or consult the Grants Administrator/Branch Chief in order to clarify and then approve or disapprove the revision. If the revision requested by the Grant Recipient would result in a change to the grantee's approved project which requires Federal prior approval, Ohio EMA will obtain the Federal agency's approval before approving the Grant Recipient's request. The Executive Director also reserves the right to approve or disapprove any revision if not consistent with the grant program. Approval may include restrictions or special conditions that must be met in order to satisfy the amendment. Grants/Program staff will ultimately issue either:
 - i) An amendment approving and authorizing, in whole or in part, the requested budget change; and as needed
 - ii) A letter to accompany an approval amendment that identifies and explains those portions of the requested change that is not approved; or
 - iii) A letter denying and explaining why the entire requested budget change was not approved.
- f. The amendment or letter will be coordinated for issue through the Executive Director's office. The amendment or letter will be issued to the Grant Recipient. The Grant Recipient will sign and return an amendment to Ohio EMA. Upon return, the Executive Director will sign the Amendment and return it to the appropriate Grants/Program staff. Staff will return a copy of the signed amendment to the Grant Recipient.
- g. Grant Recipients will not initiate, obligate, or incur any revised program cost until the signed amendment or denial letter is received. If it is discovered the Grant Recipient

made changes to projects or budgets without prior approval, Ohio EMA reserves the right to deny reimbursement of those costs even if they are eligible under the grant program. If funds were already paid to the recipient for the costs, Ohio EMA reserves the right to request the issued funds be immediately repaid to the state.

3. **Procurement** - Grant Recipients will use their own procurement procedures to incur costs under the grant program. These procedures must be consistent with applicable State and Federal procurement rules and regulations. All procurements will be conducted in a manner providing full and open competition. Methods of procurement to be followed include:
 - a. Procurement by small purchase procedures.
 - b. Procurement by sealed bids (formal advertising).
 - c. Procurement by competitive proposals.
 - d. Procurement by noncompetitive (sole source) proposals and may be used only when:
 - i) The award of a contract is infeasible under small purchase procedures, sealed bids or competitive proposals and one of the following circumstances applies:
 - (1) The item is available only from a single source; or
 - (2) After solicitation of a number of sources, competition is determined inadequate.
 - ii) Grant recipient submits documentation to Grants Staff justifying the proposed procurement prior to initiating the purchase. Justification must include a description of the project/cost, what is being contracted for, an explanation of why it is necessary to contract noncompetitively, time constraints and any other pertinent information.
 - (1) Grants Staff will evaluate the justification with appropriate Program, Fiscal, Legal, and Internal Audit staff to validate the need to proceed with or deny the noncompetitive purchase. Grants staff may direct the Grant Recipient to submit additional information should the originally submitted justification be inadequate to make a decision on whether or not to approve the purchase.
 - (2) Grants staff will provide a recommendation thru the Grants Division Director to the Executive Director, who will make the final determination, to proceed with the noncompetitive purchase or not.
 - (3) Grants staff will provide the Grant Recipient, in writing, either the approval to proceed with the purchase or refusal to proceed with the specific reasons as to why such a purchase is not approved. If not approved, the Grant Recipient will be directed to make the purchase using appropriate competitive means or to modify the budget in order to make another purchase.
4. **Cash Management.** Funds will not be paid in a lump sum, but rather disbursed over time as project costs are incurred or anticipated. Recipients will time their drawdown requests to ensure that Federal cash on hand is the minimum needed for disbursements to be made immediately or within a few days. Grant Recipients will therefore implement procedures for minimizing the time elapsing between the transfer of funds from the U.S. Treasury and disbursement.
 - a. Cash requests will be initiated by Grant Recipients only after they have incurred an eligible cost within the grant program guidelines and as per approved projects and budgets. Grant recipient will submit requests for funds via fax to appropriate Grants/Program staff with accompanying proof of cost (e.g. invoices). Staff will

- i) Acknowledge receipt of a cash request within 2 business days;
 - ii) Validate cash request in next 5 business days by ensuring:
 - (1) Costs are in line with program narrative and budget worksheets,
 - (2) Supported by appropriate proof of costs; and
 - (3) Adequate funds are in the Recipient's budget with respect to funds being requested.
 - iii) Contact grant recipient for additional information or clarification for any costs that cannot be validated before submission for payment; and then
 - iv) Submit validated cash requests to Fiscal office for payment.
- b. Staff will update master spreadsheet/database to reflect costs incurred and amount requested.
- c. Grants/Program staff, via the monitoring program, will randomly evaluate cash drawdowns by Grant Recipients to assure conformance to cash management standards.
- d. Every effort is made to avoid instances where Grant Recipient is given more funds than was requested or that can be supported by inspection, review, or audit. If it discovered that the Grant Recipient receives more funds than requested or required, Grants/Program staff will:
- i) Contact the Grant Recipient and identify the amount of funds overpaid; and
 - ii) Direct the Grant Recipient to remit the funds back to Ohio EMA within fifteen (15) days.
 - iii) If the Grant Recipient has submitted another cash request for other costs that has not yet been paid or will submit a cash request for other costs in the next five (business days), Fiscal will be directed to reduce the amount to be paid accordingly. Staff will annotate the correction on the respective cash requests.
 - iv) If the Grant Recipient refuses to pay back the funds requested, this would be cause for suspension or termination of grant award. Grants staff will also recommend the case be referred to the Attorney Generals Office for collection of the funds due. Grants Branch Chief will coordinate this action thru the Ohio EMA Attorney General's representative.
5. **Performance Reports.** Grant Recipient will complete and submit three forms of performance reports: Program performance information via cash request process, Bi-annual Strategy Implementation Report (BSIR) via DHS online reporting site, and additional reports when/if requested by DHS or Executive Director.
- a. Program performance information will be submitted as a narrative attached to each 'Cash Request.' Such information is only applicable to Planning, Organization, Training, Exercise, and Administration program activities. Grants/Program staff will validate the information submitted as part of the overall cash request approval process to include. The cash request will contain, for each program activity, concise yet clearly defined information on the following items:
- i) A comparison of actual accomplishments to the objectives established since the last cash request, percent complete and percent of objectives remaining to be complete.

- ii) Synopsis of activities completed since the last report to include any unique successes that should be shared with or could be replicated by other Grant Recipients.
 - iii) Identification and reasons for any delays or problems encountered in completing any established objective, to include explanation of cost overruns or anticipated budget changes, and how those issues will be resolved.
 - iv) Indication that program activities will be complete on/before the proposed deadline and NLT grant program period.
- b. The Bi-annual Strategy Implementation Report (BSIR) will be completed and submitted by each Grant Recipient and validated by Ohio EMA.
- i) Grants/Program Staff will assist recipients in the completion of reports as needed. This may be completed one-on-one or via regional workshops.
 - ii) Grants/Program Staff will validate submissions by ensuring award-expenditure information is current, listed projects match grant application projects, and funding allocations agree with budget worksheets. Staff will ultimately approve each submission and forward those for state submission to DHS.
 - iii) Grants Administrator will complete BSIR for Ohio EMA.
 - iv) Grants Administrator will validate all thresholds to ensure funds are fully reported. Administrator will then submit final report to DHS as per the federal reporting instructions.
- c. Grants/Program staff will coordinate with Grant Recipients to request and receive programmatic or administrative reports as/if requested by the DHS or the Executive Director.
6. **Program Period.** A grantee may only incur costs during the Performance Period specified on the Grant Recipient's Notice of Award. If grant activities cannot be completed within the original program period, the Grant Recipient will either request a performance period extension or will de-obligate their awards.
- a. Three months prior to the conclusion of a Grant Recipient's performance period, Grants/Program Staff will survey recipients to determine their ability to conclude activities within the performance period.
 - b. Grant Recipients that cannot complete activities within the performance period but desire additional time in which to complete activities will be directed to submit justification for a program extension to the Grants Branch. Justification will include:
 - i) Specific actions-steps needed to ensure completion of program activities,
 - ii) Changes to appropriate Projects and Budgets necessary to complete program activities,
 - iii) Timeline in which necessary steps will be accomplished, and
 - iv) Reasons why program activities were not completed within the original program period.
 - c. Grants Branch will evaluate all extension requests and provide a recommendation to the Grants Division Director as to which extensions should or should not be granted, to include specific reasons for each. Division Director will:
 - i) Determine which extensions to approve or reject, and brief Executive Director accordingly.

- ii) Direct Grants/Program Staff to initiate amendments for approved requests or letters for rejected requests. Letters will detail reasons for denial of any such request.
 - iii) Amendments and letters will be issued at least one month prior to the end of the grant recipient's performance period.
 - d. Grant Recipients that cannot complete activities and do not request a grant extension will receive a de-obligation letter at the end of their performance period.
 - e. De-obligated funds will be awarded to other Grant Recipients or expended by Ohio EMA.
 - i) Primary focus will be given to awarding funds to local and regional projects previously submitted that met grant guidelines for which funding was not available at the time.
 - ii) Secondary focus will be given to state agency projects previously submitted that met grant guidelines but for which funding was not available at the time.
 - (1) Grants staff will first ensure the required allocation of funds to state agencies does not violate the requirement to pass-thru a minimum percentage of funds to local units of government.
 - (2) If funding must be awarded to local units of government, eligible entities will be directed to submit projects for funding consideration.
 - iii) Tertiary focus will be given to funding projects or costs for Ohio EMA.
 - (1) The Executive Director may determine that there is not enough time to re-obligate the remaining funds or the funds remaining are not sufficient enough to re-obligate as defined above. In this case, the Director will direct the funds be obligated by Ohio EMA or returned to DHS.
 - iv) Final focus will be to de-obligate the remaining funds back to DHS and conclude the grant program.
 - f. Three months prior to the conclusion of the state's federal program period, Grants/Program staff will evaluate the need to request a federal extension in order to allow Grant Recipients additional time to conclude grant activities or time for the state to re-obligate funds.
 - i) Grants Administrator will coordinate with appropriate Program staff to provide the Grants Division Director a recommendation on the need and reasons to request a federal extension. The recommendation will include a synopsis of which grant recipients required additional time to complete program activities, which did not require additional time and had funds to re-obligate, and how to re-obligate any remaining funds.
 - ii) Grants Division Director, with concurrence of the Executive Director, will approve or modify the recommendation and direct Grants staff to forward for federal approval, or direct staff to conclude the respective program.
 - iii) Once requested and approved, Grants staff will forward copies of federal extensions to appropriate agency sections.
 - (1) Staff will draft and issue Amendments or issue new Agreements to Grant Recipients based on approved recommendation.
- 7. **Enforcement.** If the Grant Recipient materially fails to comply with any term of an award, whether stated in a federal statute or regulation, an assurance, in State guidance, a notice

of award, or elsewhere, Ohio EMA may Suspend, in whole or part, or terminate the Recipient's award.

- a. If suspension of the award is recommended, the Grants Branch Chief, in coordination with appropriate Grants/Program Staff, will:
 - i) Confirm what actions justify and warrant a suspension;
 - ii) Confirm what actions and timeframe are needed to resolve the situation;
 - iii) Brief recommended actions and timeframes with the Grants Division Director who will in turn approve or modify actions and timeframes to be taken;
 - iv) Once approved, advise the Fiscal office to suspend Recipient funding as appropriate, and what to do with funds previously requested but not yet passed thru to the Recipient.
 - v) Direct Grants/Program staff them to issue a letter via the Executive Director's signature to the Grant Recipient that explains:
 - (1) The findings/issues at hand,
 - (2) Actions needed to be taken to resolve those issues,
 - (3) The timeframe in which to complete those actions,
 - (4) How Grants/Program staff will confirm the actions taken have/not resolved the situation,
 - (5) How/if the temporary suspension will be lifted, and
 - (6) How failure to comply may/will result in termination of the Grant Recipient's award.
 - vi) Grants/Program staff will assist or monitor the actions taken by the Grant Recipient to resolve the situation, and will recommend either:
 - (1) Lifting the temporary suspension once the situation is resolved. In this case, the Grants Branch Chief will:
 - (a) Confirm the situation is resolved,
 - (b) Direct staff to issue letter to the Grant Recipient that the suspension is lifted;
 - (c) Brief Fiscal office that the suspension is lifted and to resume funding as per the grant award.
 - (2) Terminate the Grant Recipient's award if/when actions taken do/will not satisfactory resolve the situation. In this case, the Grants Branch chief will follow the steps below to terminate the award.
- b. If **termination** of the award is recommended by Grants/Program Staff or requested by the Grant Recipient, the Grants Branch Chief will:
 - i) Confirm the desire to terminate the award;
 - ii) Brief recommended reasons for termination with the Grants Division Director, Fiscal Branch Chief, and Legal Counsel (if needed), and subsequently the Executive Director. The Executive Director will
 - (1) Make final approval to terminate any such award; or
 - (2) Direct Grants/Program staff to take necessary actions and timeframes to temporarily suspend the award and resolve the situation;
 - iii) Once termination is approved, advise the Fiscal office to stop any/all payments to the Grant Recipient. Any funds currently requested will be denied and rejected

back to the federal awarding agency, unless this creates a greater burden/issue, and in that case those funds may be passed-thru and will be the final funds issued.

iv) Direct Grants/Program to issue a letter to the Grant Recipient (for Executive Director's signature) that states:

- (1) Their award is terminated at that time,
- (2) Reasons for the termination,
- (3) What funds or equipment must be returned, if needed,
- (4) How/if to appeal the decision, and
- (5) That the Grant Recipient is still liable for all funds previously received and expended.

c. Grant Recipients may, under their own initiative, notify Ohio EMA and request in writing at any time the termination of their award.

8. **Appeals.** Grant Recipients may appeal any decision by Ohio EMA as it relates to any enforcement action taken in regards to the implementation of its grant program.

a. Grant Recipient will request, in writing, an appeal of any action to the Executive Director. Grant Recipient must provide sufficient information to allow the Executive Director to determine the facts and validity of the request. The appeal shall be in writing and submitted within thirty (30) days from the date of the action being appealed. The Executive Director will:

- i) Issue a response, in writing, within 15 days from receipt of the appeal, and
- ii) Either uphold the actions taken, modify the actions taken, or reverse the actions taken.

b. If the Executive Director denies the appeal, all or in part, the Grant Recipient may submit a second appeal to the Director of the Department of Public Safety. Grant Recipient must provide sufficient additional information to allow the Director to determine the facts and validity of the request. This second appeal will be submitted in writing, through the Executive Director, not later than thirty (30) days following receipt of the Executive Director's response to the original appeal.

- i) Prior to Director making any decision on the second appeal, there will be a conference call between the Director, Executive Director, and the Grant Recipient to discuss the appeal.
- ii) The Director, following the conference call, will determine to either uphold the actions taken, modify the actions taken, or reverse the actions taken. The Grant Recipient will receive a letter as to the decision made within fifteen (15) days following the conference call. The decision made by the Director is final.

D. Grant Program Monitoring-Assistance.

Ohio EMA is responsible for managing the day-to-day operations of grant and subgrant activities. They will assure Grant Recipients comply with applicable Federal requirements to include achievement of performance goals. Subgrantee monitoring must cover each program, function, or activity. This will include a comparison of actual accomplishments and costs to the proposed objectives budgets established in the grant awards. Monitoring will be accomplished through Fiscal and Monitoring Reviews.

1. Fiscal Reviews will be accomplished in accordance with federal Single Act Audit requirements, or by audits conducted by the Auditor of State's (AoS) office and/or the DHS Office of Inspector General (OIG). Note, Ohio EMA Grants and/or Fiscal staff will

NOT complete independent financial or fiscal 'audits' of Grant Recipients. Instead, they will 'monitor' Grant Recipient fiscal activities as discussed below in item (2).

- a. Grant Recipients are responsible for obtaining audits in accordance with the Single Audit Act Amendments of 1996 (31 U.S.C. 7501-7507) and revised OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations." The Audit shall be made by an independent auditor in accordance with generally accepted government auditing standards covering financial audits. This requirement is defined on the Grant Recipient's Notice of Award and as well as the respective local and federal grant guidance. Grants staff will annually remind Grant Recipients of the requirement. The results of each Grant Recipient's Single Audit will be reviewed by respective Grants/Program/Fiscal staff to identify, address, and resolve any findings directly with the Grant Recipient.
 - i) IF findings ARE issued and necessitate taking action with/against a Grant Recipient, appropriate Grants/Program staff will:
 - (1) Review internal records, with internal Fiscal staff as needed, to confirm or deny the findings;
 - (2) Contact the Grant Recipient in question and review the findings, and identify steps/actions needed to address and resolve those findings; and
 - (3) Document in the Grant Recipient's file those actions taken with/by the Grant Recipient to address and resolve the findings (to include an On-Site Monitoring Visit if warranted).
 - (4) If funds must be returned, direct how to repay those via the Fiscal office.
 - ii) IF findings are NOT issued, appropriate Grants/Program staff will simply annotate in the Grant Recipient's file that the Single Audit was reviewed and found to contain no findings.
- b. Financial audits of grant recipients may be accomplished by the AoS based on their internal agency requirements and timelines. Internal Audit Section will coordinate with Grants Division personnel on how to review and address the AoS audits. Internal Audit Section will:
 - i) Identify the State accounting system a master list of grant recipients that received federal grant funding during the state fiscal year;
 - ii) Identify from that list those grant recipients receiving more than \$10,000;
 - iii) For those recipients, review the AoS website and obtain released audit reports, and as necessary request any management letters issued by the AoS for those audit reports;
 - iv) Identify any finding, recommendation, or corrective action related to HS grant funds in the audit reports and/or management letters; and
 - v) Compile and submit a summary report to Ohio EMA Grants Branch with regards to each audit report and management letter, and will specifically identify those which require action by Ohio EMA.
- c. Ohio EMA Grants Staff will share the respective reports with the appropriate Program staff for action. Grants/Program staff will:
 - i) Review internal records, with Fiscal staff as needed, to confirm or refute the audit report and management letter findings, recommendations, and/or corrective actions;

- ii) Contact each Grant Recipient in question and review the report and management letter to identify steps/actions needed to address and resolve each finding and/or recommendation, and evaluate the recipient's corrective actions;
 - iii) Develop and issue a Management Letter to each Grant Recipient in question that directs what steps/actions must be taken to address and resolve each finding and/or recommendation. The Management Letter will be submitted to the Grant Recipient within six (6) months after receipt of the original audit report.
 - d. The respective Grants/Program Staff will monitor the Grant Recipient to ensure they implement the directed steps/actions as intended. Failure to comply may result in the suspension or termination of the Grant Recipient's award. Staff will file all related reports and letters in the appropriate Grant Recipient file, copies of which will be given to the Internal Audit section for coordination (or action as needed).
 - e. Financial audits of grant recipients may also be accomplished by the OIG based on their internal agency requirements and timelines. Internal Audit Section will coordinate with Grants Division personnel on how to review and address any finding or recommendation provided in the OIG audit. Recommended actions to take to resolve any finding or recommendation will be briefed to the Executive Director for concurrence before enacting any such action.
 - i) With the Executive Director's concurrence, the appropriate Grants/Program Staff will work with the Grant Recipient (as discussed above) to address the respective OIG finding and/or recommendation, and to implement the Ohio EMA directed corrective actions.
 - ii) The respective Grants/Program Staff will monitor the Grant Recipient to ensure they implement the directed steps/actions as intended. Failure to comply may result in the suspension or termination of the Grant Recipient's award. Staff will file all related reports and letters in the appropriate Grant Recipient file, copies of which will be given to the Internal Audit section for coordination (or action as needed).
- 2. Programmatic reviews are accomplished to validate a Grant Recipient's compliance and adherence to the particular grant program's requirements and restrictions.
 - a. Scheduling of programmatic reviews will be completed on a risk based formula.
 - i) The following risk based formula will be used to determine the priority of conducting a programmatic review.
 - (1) Time since last programmatic review. (weighted times two)
 - (a) Less than 1 year
 - (i) 1 point
 - (b) Less than 2 years
 - (i) 2 points
 - (c) Less than 3 years
 - (i) 3 points
 - (d) Has not been monitored
 - (i) 4 points
 - (2) Single Audit Result. (weighted times three)
 - (a) No findings or management letter for sub-grantee or parent organization.

- (i) 1 point
 - (b) No findings but management letter associated with Homeland Security Programs.
 - (i) 2 points
 - (c) Homeland Security Programs not reviewed in single audit.
 - (i) 3 points
 - (d) Finding for parent organization but not related to Homeland Security Programs.
 - (i) 4 points
 - (e) Finding for sub-grantee but not associated with Homeland Security Programs.
 - (i) 5 points
 - (f) Finding for Homeland Security Programs.
 - (i) 6 points
- (3) Level of funding. (weighted times 1)
 - (a) \$0 to \$50,000.00
 - (i) 1 point
 - (b) \$50,000.01 to \$100,000.00
 - (i) 2 points
 - (c) \$100,000.01 to \$250,000.00
 - (i) 3 points
 - (d) \$250,000.01 to \$1,000,000.00
 - (i) 4 points
 - (e) \$1,000,000.01 and higher
 - (i) 5 points
- b. Reviews will evaluate programmatic activities to include grant administration and fiscal compliance. Reviews will Grant Recipients' files and processes are sufficient to:
 - i) Permit the tracing of funds to specific expenditures and to establish that such funds have not been used in violation of the restrictions and prohibitions of applicable federal and state grant guidance;
 - ii) Accomplishing programmatic goals-objectives defined in the Grant Recipients' application in support of specific State Homeland Security Strategy (SHSS) and the National Preparedness Goals.
- c. A program monitoring review may evaluate all or only a random sampling of grant activities within a given grant program. A review may include activities within one or more open grants and/or recently closed grants.
- d. Program monitoring will be accomplished via Desk or On-site Monitoring Review as outlined below. Program reviews will be completed by the appropriate Grants and/or Program staff for those respective portions of the grant they administer on a daily basis. Grants/Program staff will also provide Grant Recipients routine technical assistance that enables them to comply with applicable federal and state grant guidance in the administration and implementation of the grant programs.

- i) **Desk Reviews** are completed in the Ohio EMA office by the respective staff and will evaluate a specific cost or activity within a single open grant. In the desk review process, Staff will:
 - (1) Contact the Grant Recipient, via phone or email, and identify the specific cost or grant activity that is to be reviewed;
 - (2) Direct the Grant Recipient to submit specific documentation that clarifies or further supports the specific cost or grant activity;
 - (3) Provide the Grant Recipient written feedback within five (5) days of receipt of the requested materials that shows the documentation:
 - (a) Successfully validated the specific cost or activity and no further actions are needed;
 - (b) Identified a weakness in the management of the cost or activity, and requires staff to make recommendations to correct the weakness and request feedback to show how the recommendations are to be implemented; or
 - (c) Identified a finding that requires an immediate corrective action and possible suspension or termination of an award, and requires staff to direct the recipient to immediately initiate corrections and provide additional documentation to show how the corrective actions are to be implemented.
 - (4) Complete a On-Site monitoring review to confirm any corrective actions were successfully implemented;
 - (5) Complete a minimum of two desk reviews per calendar year for each open grant for each Grant Recipient; and
 - (6) Document each review in the grant files to include date initiated, summary of the review, any recommendations or corrective actions needed, and the recommendations and corrective actions taken.
- ii) **On-Site Monitoring Reviews** are completed at the Grant Recipient's office by a one or more Grants/Program staff and, if needed, one or more Fiscal or Internal Audit staff. The review will evaluate specific costs and fiscal/grant activities, to include programmatic achievements, within any open or recently closed grant. The review may also include the inspection of Equipment purchased with grant funds. In the on-site review process, Staff will:
 - (1) Contact the Grant Recipient, a minimum of thirty (30) days prior to the review, and identify the intent to complete an on-site review and to set a date for the review;
 - (2) Provide the Grant Recipient, in writing, the specific costs and grants to be reviewed;
 - (3) Direct the Grant Recipient to prepare, and as able submit prior to the review, specific documentation that clarifies or further supports the specific costs or grant activity;
 - (4) Conduct the review, and as needed take additional information back to the office to complete the review;
 - (5) Provide the Grant Recipient via the Grants Division Director a formal report, in writing, within fifteen (15) days of the review that identifies:

- (a) Program activities that are being successfully completed and could be shared with other Grant Recipients as a 'best practice';
 - (b) Weaknesses in the management of a cost or activity, and requires staff to make recommendations on how to correct the weakness and requests the Recipient to report back how the recommendations are to be implemented; and
 - (c) Findings that require immediate corrective actions and possible suspension or termination of an award, and requires staff to direct the Recipient to immediately initiate corrections and provide additional documentation to show how the corrective actions are to be implemented.
- (6) Complete additional On-Site reviews as necessary to confirm corrective actions were successfully implemented;
- (7) Complete a minimum of two On-Site reviews per grant performance period for each open grant for each Grant Recipient; and
- (8) Document each review in the grant files to include date initiated, summary of the review, any recommendations or corrective actions needed, and the recommendations and corrective actions taken.
- iii) Technical Assistance will be provided to Grant Recipients via statewide conferences, regional workshops, and one-on-one recipient training.
- (1) Grants/program staff will provide instruction and guidance on grant programs during the semi-annual Director's conference. Fall conference agendas will address upcoming grant opportunities to include any new federal or state initiatives. Spring conference agendas will include training on grant or fiscal management or assessments of existing program initiatives.
 - (2) Regional workshops will be provided as needed to explain new federal or state initiatives in more detail than provided in statewide conferences or to address specific local-regional questions. Workshops will also be provided, schedule permitting, to groups of eligible Grant Recipients requesting specific training or education on grant program activities.
 - (3) One-on-one training will be limited to the availability of Grants/Program staff to provide assistance to a single Grant Recipient. Preference will be given to new Grant Recipient program managers or administrators.
- e. Grant Recipients will comply with any corrective action recommendations or directives made as a result of a monitoring review. Failure to comply is grounds for suspension or termination of the Grant Recipient's award.

F. Reporting Requirements

1. **Financial Status Report (FSR).** Fiscal office will complete and submit required fiscal reports as per federal grant requirements. Grants Administrator will provide a reminder to Fiscal staff at the end of each federal fiscal quarter. Copies of each submitted report will be provided to the Grants Administrator.
2. Programmatic,
 - a. **Categorical Assistance Performance Report (CAPR).** Grants Administrator will complete CAPR as required by the federal grant program guidelines. Grants Administrator will advise Grants Branch Chief, Division Director, and federal Program Officer once required reports are submitted.

- i) Reports for all open grants will be completed NLT one week prior to the respective reporting deadline (January 31 and July 31 each year).
 - ii) Reports for grant closeout will be provided to Grants Branch Chief, Division Director, and federal Program Officer for review and comment prior to final submission.
- b. **Bi-annual Strategic Implementation Report (BSIR).** Grants/Program staff will complete respective BSIR portions for Ohio EMA costs in coordination with Grants Administrator. Grants Administrator will complete final BSIR submission once all Grant Recipients and OEMA data has been entered and validated thru the online system, but not later than the reporting deadline (January 31 and July 31 each year). Grants Administrator will advise Grants Branch Chief, Division Director, and federal Program Officer once required reports are submitted.

G. File Management

1. Grants/Program staff will maintain a separate grant recipient file each award issued. Grant files will be segregated and contain the following information for each award issued.
 - a. Notice of Award & Grant Agreement, to include Amendments.
 - b. Project Narratives – Grant Application information
 - c. Equipment Budgets – Cash Requests
 - d. Planning, Organization, Training, Exercise, Admin Budgets – Cash Requests
 - e. Monitoring Review Activity Log – Reports
 - f. Audit Review Activity Log – Reports
 - g. General Correspondence with Grant Recipient
2. Grant Administrator and Branch Chief will maintain a separate file/folder to track each federal award issued to the state, to include:
 - a. Federal Award
 - b. Grant Adjustment Notices
 - c. Federal Program Guidance, to include applicable Information Bulletins
 - d. State Grant Application materials, to include federal correspondence on same
 - e. Categorical Progress Reports
 - f. Financial Status Reports
 - g. Grant Recipient Guidance, to include applicable forms
 - h. General Correspondence with federal granting agency
3. Fiscal staff will maintain all financial reports/records necessary to document and show funds requested from federal agency, funds paid out to grant recipients, and funds paid out to Ohio EMA.

POST-AWARD PHASE – This phase starts with the closeout and reconciliation of Grant Recipient awards, continues thru the final reconciliation and reporting to DHS of fiscal/program costs/activities, and concludes with archival of grant materials.

A. Reconciliation and Closeout.

Grant/Program Coordinators will close out individual Grant Recipient awards, and complete final entry/review of grant database/spreadsheet information. Grant Administrator/Branch

Chief will close out financial status for all Grant Recipients and Ohio EMA award with Fiscal Branch. Respective Division and Executive Directors will be briefed on final status of grant. Final Financial and Program reports will be filed with appropriate federal program offices. Grant files will be consolidated for future auditing and eventual historical closure.

1. **Grant Recipient Awards.** Once a Grant Recipient has completed all work under the grant and has made their last cash request, Grants/Program staff may initiate and complete the closeout process. This process may be completed even though the Recipient's performance period is still open, but will be completed not later than 60 days after the end of their performance period.
 - a. Request the Grant Recipient to submit written notification and verification, certified by their Fiscal office, that all funds drawdown have in fact been disbursed and no respective grant funds remain in any local account.
 - b. Complete a final 'desk review' of the Grant Recipient file/account:
 - i) Confirm cash requests total the Grant Recipient's final award total (as adjusted by any additions to or de-obligations of funding),
 - ii) Confirm a final budget is on file and that it accurately reflects the expenses incurred and paid for during the grant program period,
 - iii) Confirm all program projects are complete, and request proper documentation to certify final program activity status,
 - iv) Review the Grant Recipient's file to ensure all necessary reports and correspondence are on-hand.

Note: Grant Recipients may be required to complete final BSIR IAW respective federal grant reporting requirements even though they have completed all spending and we show the account is complete. The respective Grants/Program coordinators will not close out the account under the final report is complete.

- v) Cross-check spending status and award balance against Fiscal office records.
- vi) Issue a letter to the Grant Recipient noting that their respective grant award has been properly executed, all activities are complete and funds expended IAW grant guidelines, and thus their grant agreement has now terminated. This report will be copied to Fiscal.
- vii) Enter appropriate notation into the master grant spreadsheet/database that spending is complete for the Grant Recipient, and enter a similar note into the Grant Recipient's file.

Note: If any errors, omissions, or mistakes are uncovered in any of the above steps, the Coordinator will resolve the issues directly with the Grant Recipient and/or Fiscal. The Grant Recipient account will not be closed until all issues are resolved. All issues must be resolved NLT 30 days following the end of the grant program period.

- viii) The closeout of a grant does not affect:
 - (1) Ohio EMA's right to disallow costs and recover funds on the basis of an audit after the closeout or additional monitoring reviews; or
 - (2) The grantee's obligation to return any funds due as a result of later refunds, corrections, or other transactions.
- ix) The Grants Administrator/Branch Chief will cross-check master spreadsheet or database to confirm **all** Grant Recipients' accounts have been properly closed.

They will then cross-check total grant figures with Fiscal Branch to confirm all funds have been properly drawdown and disbursed to Grant Recipients (including Ohio EMA). Discrepancies will be resolved NLT sixty (60) days following the end of the grant period.

- x) Final Grant Recipient allocations and expenditures will be briefed to respective agency Directors by the Grants Branch Chief.

2. State-Federal Award

- a. As Grants/Program Coordinators reconcile and close out Grant Recipient awards, the Grants Administrator will coordinate with Fiscal office to complete final reconciliation of the state's federal award. Grants and Fiscal will reconcile federal drawdown reports as compared to state revenue and disbursement reports.
- b. Fiscal office will prepare records necessary to complete and submit final Financial Status Report (SF-269). Fiscal will submit the report NLT ninety (90) days following the end of the federal program period.
 - i) If it is determined that Ohio EMA cannot complete such a report by that deadline, Grants submit thru the Executive Director a request for a federal extension of the reconciliation period.
 - ii) Grants and Fiscal will provide the appropriate documentation to justify the need for the extension.
 - iii) Once an extension is approved, Grants and Fiscal will ensure final reconciliation will be submitted within the extended period.
- c. Grants office will oversee final Bi-Annual Strategy Implementation Report (BSIR) (as previously noted). Grants will coordinate with the applicable Program offices to confirm final programmatic activities and reports have been completed and submitted as directed. Grants will then draft and submit thru the Executive Director a final letter to the grantor indicating all grant activity and spending is complete.

B. Long-Term Grant Management

1. Grant Recipient.

- a. Record Management. Once the state submits its final Fiscal and Programmatic reports to the grantor, the Grants Branch will issue a letter to all Grant Recipients that the final state report for closeout has been submitted. The Recipients will then plan to maintain their grant files for a minimum of three (3) years from that date unless local record retention rules dictate a longer timeframe or as dictated by the grantor. However, as per federal regulations, the retention period for equipment records starts from the date of the equipment disposition.
 - i) If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular three-year period, whichever is later.
 - ii) Once retention period is complete, Grant Recipient will follow local procedures to archive the files as necessary.
- b. Equipment Management. Equipment shall continue to be used for which it was acquired as long as needed or until disposition takes place, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a Federal agency. When original (or replacement)

equipment is no longer needed, disposition of the equipment will be coordinated by the Grant Recipient with Ohio EMA.

- c. Grants and Internal Audit staff will continue to monitor and review Single Audit and Auditor of State records for 'closed' grants, and will respond to any recommendations, findings, or issues as per monitoring procedures as previously defined.

2. Ohio EMA

- a. Record Management. Grants Branch will coordinate with appropriate Program and Fiscal staff to gather applicable grants records to ensure they contain appropriate documentation. Except as otherwise provided, records must be retained for three years starting from the day Ohio EMA submits to the grantor its last expenditure report for the respective grant. However, the retention period for equipment records starts from the date of the equipment disposition.
 - i) If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular three-year period, whichever is later.
 - ii) Once retention period is complete, Grants staff will coordinate with the Legal section for submission of files for archive.
- b. Equipment Management. Technical support section shall coordinate the inventory and management of equipment purchased with grant funds. The equipment will continue to be used for which it was acquired as long as needed or until disposition takes place, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a Federal agency. When original (or replacement) equipment is no longer needed, disposition of the equipment will be made as per 28 CFR 66 and/or appropriate grantor guidelines.
 - i) Technical Support staff will document the disposition of all equipment and forward copies of that disposition to Grants Branch. Grants staff will add that information into grant files unless already submitted for archive. In this case, Grants will forward the disposition records for archive with the original grant files.