STATE OF VERMONT

DEPARTMENT OF PUBLIC SAFETY

GRANTING PLAN PART 4

Program Workcenters

Effective Date July 1, 2015

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Chapter One:

Introduction

This plan serves as the general guidance for the Program workcenters of the Department of Public Safety for programmatic monitoring of recipients who receive grant funds. The Department of Public Safety issues grants through: 1) state funds and 2) passing through federal funds to subrecipients. In this guide the term subrecipient and subrecipient is used for both a state fund grantee and a federal fund subrecipient. The monitoring process is different depending on the program.

Programmatic Monitoring

Program managers should ensure they have a process to carefully review programmatic performance of subrecipients.

Program managers should determine high risk subrecipients prior to awarding funds. For those subrecipients that are deemed high risk, DPS will determine if sanctions will be applied such as; schedule a programmatic monitoring site visit, restricting cash advance, require additional reporting and require detailed documentation.

During programmatic monitoring program manager should; (1) review financial and progress reports for accuracy, completeness, and alignment with project goals. (2) Examine the condition of equipment and inventory. (3) Follow-up on the subrecipient's understanding of grant award terms. (4) Go over how progress is going and plan on project completion. (5) Include consideration for fraud, waste & abuse.

Program workcenter personnel are responsible for monitoring performance of subrecipient based on the performance measures as established in the solicitation and subgrant agreement. Subrecipients will submit periodic progress reports, that include activity performed, interim performance measures where appropriate, identification of problems and how they were overcome, and an assessment of the potential to reach the stated goal or objectives.

Program workcenter personnel will monitor each subrecipient's progress toward meeting measurable goals by performing reviews of the periodic reports submitted by subrecipients. Each division must establish a monitoring schedule that incorporates both new and experienced subrecipients. Program workcenter personnel should monitor those subrecipients that have a high risk of not meeting goals soon after the identification of potential issues. During the site visit, they should review activity/progress reports for accuracy, completeness and alignment with project goals. Site visits are an opportunity to follow-up on the subrecipient understanding of grant award content and terms. During the site visit, program workcenter personnel can go over how progress is going, adjust goals, develop corrective actions, plan on project completion and a general impression of the subrecipient environment. DPS staff will use a checklist when they conduct a subrecipient monitoring. Areas for review during on-site visits are project files, purchasing procedures and inventory of any equipment purchased through the current or previous subaward(s).

Fiscal Monitoring see DPS Granting Plan Part 2 & 3.

Fraud, Waste, & Abuse

Program managers should inform their supervisor, a division director, or DPS auditor if they have evidence a subrecipient has submitted a false claim under the False Claims Act or has committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving those funds.

State employees should report suspected fraud, waste, or abuse to their supervisor/manager (or in accordance with their department's policy) or to the State Auditor's Office confidential tip line at 1-877-290-1400.

Non-state employees (including vendors, customers, contractors, etc.) should report suspected fraud, waste, or abuse in Vermont State Government to the State Auditor's Office confidential tip line at the above number.

What is meant by the terms "fraud", "waste" and "abuse"?

Note: The following descriptions do not represent legal advice and are provided solely to give some context to these commonly used terms; please consult with your legal counsel for further guidance:

Fraud: Generally defined in the law as an intentional act to deceive or cheat, ordinarily for the purpose or result of causing a detriment to another and/or bringing about some benefit to oneself or others. Under common law, three elements are required to prove fraud: (1) a material false statement made with intent to deceive, (2) a victim's reliance on the statement and (3) damages.

Waste: Significant loss or misuse of state resources that results from deficient or negligent practices, controls, or decisions. Waste involves behavior that is deficient or improper when compared with behavior that a prudent person would consider reasonable and necessary given the facts and circumstances. Waste does not necessarily involve fraud or other violations of law.

Abuse: Grossly intentional, wrongful, or improper use of resources or misuse of rank, position, or authority. Abuse involves behavior that is deficient or improper when compared with behavior that a prudent person would consider reasonable and necessary given the facts and circumstances. Abuse does not necessarily involve fraud or other violations of law[1].

[1] http://finance.vermont.gov/faq/ic_faq

Chapter 2 Issuance Procedures

A. State Police Grantee Selection Process: Below is the short description on how it is determined who will receive a subaward.

General ***Vermont State Police*** **Issuance Process**:
A letter and an application form is sent to the Local Law Enforcement Agencies in the area in which a position is open for a local officer to join the Drug Task Force.

1. Once all the applications are received, by the close date stated in the letter, an interview is conducted.
2. The Lieutenants, the Captain and non VSP individual (Prosecutor, State's attorney Etc.) interview the candidates.
3. They choose the candidate best suited for the task force and have a scoring process in place. (Attached).
4. Local officers are not replaced yearly as officers are trained in Task Force Procedures and the cost to hire new officers yearly would be excessive and unaffordable.

Marine Program
Grantee Selection: Law Enforcement Agencies performing recreational boating enforcement and investigations may apply for the United States Coast Guard Office of Boating Safety Grant as a sub recipient through the Department of Public Safety. The grant traditionally has been funding agencies already engaged in a recreational boating safety program that interacts with the boating public in their assigned area of responsibility.

The **score sheet** that is used in State Police.

GMU-208 Form "Application Score Sheet"

B. DEMHS Grantee Selection Process: Below is the short description on how it is determined who will receive a subaward.

General Division of Emergency Management & Homeland Security (DEMHS) Issuance Procedures

Prior to a grant award coming from a source, DEMHS updates the Threats, Hazards, Identification and Risk Assessment (THIRA) and the State Preparedness Report (SPR) with assistance from the Grants Review Committee, Working Group members, State Agencies and other partners identified in the planning phase of the THIRA/SPR process for each year.

Results from the THIRA and SPR are analyzed to determine funding priorities, which are identified with consideration given to those areas identified as having the lowest scores on the State Preparedness Report. Funding priorities are discussed with each Working Group and requests for proposals are developed to address the need identified. Requests for Proposals (RFP) are released by the Program Manager.

Applications are received at the Financial Office in response to the RFP. Each application is entered into a spreadsheet documenting the scope of work, amount of request, what support documentation was provided and which eligibility requirements have been met. Programmatic and financial checks are then completed. Examples of this include, but are not limited to:

- *National Incident Management System Compliance*
- *Current Local Emergency Operations Plan on file with the Division*
- *National Incident Based Reporting System is current for law enforcement agencies*
- *National Fire Incident Reporting System is current for fire agencies*
- *Whether or not a cash advance is requested*
- *Whether or not a cash advance policy is on file with Financial Office*
- *Whether or not the Risk Assessment Survey has been completed*
- *Whether or not the Procurement Policy was submitted with the application*
- *What the expiration date in SAM.gov is*
- *Whether or not the agency is delinquent with F&M and if so, which years*
- *Whether or not a current Certificate of Insurance has been submitted*

The spreadsheet is double-checked by the Program Manger before being sent to the applicable Working Group for their review. Each member of the Working Group reviews the spreadsheet prior to the Working Group meeting. At the Working Group meeting, each application submitted is reviewed independently by the members of the Working Group. The Working Group discusses any questions regarding the application and scores the application collectively as a group based on the criteria outlined in the RFP.

Public Assistance For Federal Disaster FEMA conducts a Preliminary Damage Assessment (PDA) to determine damage totals. The DEMHS **Recovery and Mitigation Section Chief** coordinates Governor's request for a Federal disaster based on the findings of the PDA, including National Weather Service documentation, PDA results, and **Federal Form 010-0-013**. FEMA Region 1 staff may offer guidance, review and comment on a draft declaration request before submitting to Governor's office.

A Federal Public Assistance disaster event is declared by the President. A paper copy of the Standard Form (SF) 424 Federal Grant application is completed by the Business Office in consultation with the PAO and routed to the **Commissioner of the Department of Public Safety** for signature. The Business Office then submits the SF 424 electronically to FEMA Region 1 through EMMIE.

The Public Assistance Officer (PAO) conducts Applicant Briefings in declared areas for towns and other potential Applicants to attend. Applicants must submit **Request for Public Assistance** (RPA) forms *within 30 days of the declaration date to be eligible, so timing of the Applicant Briefings immediately following a declared event is crucial*. RPA'S are entered in EMMIE for towns by the DEMHS Recovery and Mitigation Section. Vermont **Emergency Relief and Assistance Fund** (ERAF) percentages are determined by the Secretary of Administration or designee, based on conformance with ERAF rule requirements, and provided to the Business Office based on updated information as of 30 days after a federal declaration and/or as documented on the Vermont Agency of Natural Resources Flood Ready website (www.floodready.vermont.gov). The Business Office verifies that Applicants are registered with SAM.GOV, have a federal tax id number, and meet other federal and state requirements.

Process:

1. An Emergency Operations Center Activation and/or potential Federal Declaration event occurs.
    a. **The Public Assistance Officer** (PAO) requests a tracking code (e.g. task profile ID) from Department of Public Safety **Business Office.**
    b. **The Business Office** sets up a tracking code(s) for proper timesheet tracking.
    c. Continuous time allocable to a specific disaster grant worked by **DPS personnel,** will, to the extent practicable, be tracked to disaster-specific accounting codes.

2. **Director of the Vermont Division of Emergency Management and Homeland Security** (DEMHS) requests a **Preliminary Damage Assessment** (PDA) by **Federal Emergency Management Agency** (FEMA).

3. FEMA conducts PDA's in coordination with the DEMHS Recovery and Mitigation Section and **Vermont Agency of Transportation** (VTrans) personnel (pursuant to DPS/VTrans MOU) to determine damage totals.

4. The DEMHS **Recovery and Mitigation Section Chief** coordinates Governor's request for a Federal disaster based on the findings of the PDA, including National Weather Service documentation, PDA results, and **Federal Form 010-0-013**. FEMA Region 1 staff may offer guidance, review and comment on a draft declaration request before submitting to Governor's office.

5. A Federal Public Assistance disaster event is declared by the President. A paper copy of the Standard Form (SF) 424 Federal Grant application is completed by the Business Office in consultation with the PAO and routed to the **Commissioner of the Department of Public Safety** for signature. The Business Office then submits the SF 424 electronically to FEMA Region 1 through EMMIE.

6. When FEMA awards the grant to DPS as Grantee, the **Business Office** then prepares the **Vermont Department of Finance and Management AA-1 form** and submits the form with any supporting documentation to the Legislature's **Joint Fiscal Office** (JFO) for approval to accept the award (V.S.A. 32, § 5).
   a. If there are any new positions requested to meet the requirements of the grant, they will be included in the AA-1 document for approval. The Recovery and Mitigation Section Chief will prepare a Joint Fiscal Committee Review Limited Service-Grant Funded Position Request Form if required (available on the Department of Human Resources web page: http://humanresources.vermont.gov/forms). The Joint Fiscal Office approval time line is unpredictable and can be lengthy so timely submission is critical.
   b. Upon JFO approval, the Business Office notifies the DEMHS Recovery and Mitigation Section Chief.

7. The **FEMA-State Agreement** is executed via the **State Coordinating Officer** after the Commissioner has signed off on the grant agreement (as designated in Exhibit A of the FEMA- State Agreement).

8. The Public Assistance Administrative Plan Amendment for the declared disaster is developed by PAO and submitted to FEMA by PAO along with the entire Public Assistance Administrative Plan.

9. The PAO conducts Applicant Briefings in declared areas for towns and other potential Applicants to attend. Applicants must submit **Request for Public Assistance** (RPA) forms within 30 days of the declaration date to be eligible, so timing of the Applicant Briefings immediately following a declared event is crucial. <u>Applicant briefing guidance from the Business Office should include notice that local share cannot come from a federal source.</u>

10. RPA'S are entered in EMMIE for towns by the DEMHS Recovery and Mitigation Section. Vermont **Emergency Relief and Assistance Fund** (ERAF) percentages are determined by the Secretary of Administration or designee, based on conformance with ERAF rule requirements, and provided to the Business Office based on updated information as of 30 days after a federal declaration and/or as documented on the Vermont Agency of Natural Resources Flood Ready website (www.floodready.vermont.gov). The Business Office verifies that Applicants are registered with SAM.GOV, have a federal tax id number, and meet other federal and state requirements.

11. Upon approval of RPA's:
    a. The PAO notifies the Business Office to issue Subgrant agreements to applicants for signature.
    b. FEMA schedules and conducts kick off meetings for Applicants that have approved RPAs. A member of the Recovery and Mitigation Team and/or a District Tech will, to the extent practicable, attend the Kick-off meeting in support of each Applicant.
    c. Project Specialists from FEMA gather documentation from Applicants to write up project worksheets that they submit into EMMIE to go through various FEMA review queues. Applicants have 60 days from the Kick-off meeting to identify all damaged sites and provide documentation to FEMA.

12. The PAO or his/her designee notifies the Business Office of each new EMMIE obligation.

13. The Business Office follows Agency of Administration Bulletin 5.0 to issue subgrant agreements by performing a risk assessment and requesting appointing authority approval for any recipient that is high risk. The Business Office then issues to the subrecipients a copy of their executed subgrant along with the financial report form **(Financial Report Workbook; GMU 502F**) and a large project quarterly report form (for programmatic progress reporting) if the Applicant/Subrecipient has one or more large projects. Time is of the essence in issuing executed subgrants so that disaster recovery funds can be released to the Applicants as soon as possible after obligation.

14. The PAO reviews lock-in amount in letter from FEMA regarding section 324 management costs, and responds accordingly.
    a. The PAO, in consultation with the Recovery and Mitigation Section Chief and the Business Office, discuss the lock-in amount and how to spend available section 324 funds.
    b. A letter with this information, and a copy of the DPS Grant Management Process Manual is sent to FEMA within 120 days of disaster declaration by the PAO or designee.

15. Subrecipients submit programmatic progress quarterly report to PAO (by January 15, April 15, July 15, October 15 and for final closeout) for all large projects. The **Quarterly Large Project Progress Report form** is posted on the DEMHS website. The PAO or designee will submit Large Project Quarterly Reports using the FEMA form. Deadline for programmatic progress quarterly reports are due to FEMA January 30, April 30, July 30, and October 30 and for final closeout.

16. When the PAO receives a Large Project Quarterly Report that shows an Applicant has 75% or more of their project completed, the PAO or designee, will email to the Applicant the **Large Project Closeout Request** form, **Closeout FEMA Template**, and the **FEMA Project Documentation Closeout Checklist**. When a project is ready for Closeout, the Applicant must submit the **Large Project Closeout Request** form to the PAO. This form states all work was completed in accordance to the scope of work written in the Project Worksheet, and completed within the approved Period of Performance.

17. Large projects must go through a formal closeout process as detailed in DAP 9570.14. The Closeout documentation must be organized according to the program guidance available at vem.vermont.gov/publicassistance.

18. Once a Large Project Closeout Request form is received, A DEMHS Public Assistance Coordinator will be assigned to work with the Applicant to complete Closeout of the project, which will include a final **Project Completion and Certification Report** (PCCR) large project closeout form for each large project.

19. ***Obligation of Projects:***
    a. FEMA obligates **large projects**. Subrecipients can request payments from Business Office for up to 75% of federal share on large projects by sending in their financial report workbook, GMU 502F, as they complete work. Note: for large projects, they need to document expenses and request payment.
        i. In special cases -- when the Subrecipients can document actual costs higher than estimated project costs prior to closeout -- the PAO can make an exception and request in writing that the Business Office release additional funds up to 90% of the federal share.
    b. FEMA obligates **small projects**. Subrecipients need to send their financial report workbook, GMU 502F, to receive 100% of their federal share for awarded small projects upon obligation.
        i. To receive the State ERAF share on small projects, ALL of a Subrecipient's small and large projects, must be obligated and have a **Project Completion and Certification Report** (PCCR) form completed.

20. **Project Completion and Certification Report** (PCCR): When all of a subrecipient's **small** projects are completed, a **Project Completion and Certification Report** form will be sent from DEMHS to the Agency of Transportation District Technician.
    a. A **Public Assistance Coordinator** (PAC) designated by the PAO will email the town's completed PCCR form to the Agency of Transportation District Technician.
    b. The PCCR is completed with a final inspection on each project by the District Technician to determine that the work was completed in accordance with the written scope of work and all applicable agreements and/or permits.
    c. The District Technician and Applicant must sign and submit it back to the PAO.

21. The PAO will review and sign off on the PCCR form, and send to the Business Office.
    a. A PAC designated by the PAO will track status of PCCRs that have been sent and returned.

22. The Business Office uses the PCCR small project and/or PCCR large project closeout form along with the GMU 502F to reimburse the ERAF State Share of the Subgrantee's obligated projects. FINAL State Share is dispersed only after ALL small and large projects are obligated and Closed out in EMMIE.
    a. In special cases, the State share can be released before all final projects are completed provided that adequate documentation from the Subrecipient and District Tech is provided (e.g. Town of Holland in DR1995, when the town had one large outstanding project not yet completed and all other projects completed).

23. The DEMHS Recovery Team utilizes the financial tracking code on all disaster related costs (i.e. contracts, Purchase Orders (PO's), invoices, employee expense reports etc.). The Business Office will run a monthly VISION expense report to determine amount and will draw down funds accordingly from the Payment Management System on a monthly basis.

24. The Business Office will submit federal financial quarterly report (SF 425) by January 30, April 30, July 30, and October 30 and for final closeout. <u>Business Office will report costs and associated drawdowns for Sec. 324 on a quarterly basis per 44 CFR Section 207.8(c.)</u>

25. The Business Office will complete and submit the FINAL SF 425.

26. The Business Office will retain all original subgrant agreement documents in a master file.

Hazard Mitigation Grant Program (HMGP) funding is available, when Presidential major disaster declaration, in the areas of the State requested by the Governor. The amount of HMGP funding available to the Applicant is based on the estimated total Federal assistance, subject to the sliding scale formula outlined in Title 44 CFR.

The process for applicants to apply depends on if DEMHS already has a list of project that could be completed from prior disaster due to no more funding. They will try to address prior incomplete projects and if there is still funding then send out RFP that is posted on the DEMHS website. There are several eligible activities that are listed on the Hazard Mitigation Assistance Guidance February 27, 2015 page 33 Table 3: Eligible Activates by Program.

Applicants are received and reviewed by the Hazard Mitigation Committee. Once applications are approved they are processed through NEMIS (federal portal). At this time DEMHS waits for FEMA approval. Once award has been received it is forward to Financial Office to generate a subaward.

Subrecipient agreements are issued by the Financial Office to approved applicants based on the approved scope of work. Applicants must sign and return the subrecipient agreement to the Financial Office. Financial Office then generates a routing sheet which is signed by the Financial Office Supervisor and Division Director. Once complete, Financial Office routes the subrecipient agreement to Commissioner or designee for final execution signature and returned to the Financial Office. Financial Office emails the executed subrecipient agreement, financial report form, progress report and asset list template, when applicable, back to the applicant. Applicant is then able to move forward with the approved scope of work.

An applicant can request an amendment in writing based on a delay or change in scope of project. No verbal requests for an amendment will be entertained. The Financial Office and Program Manager will review the request for an amendment and discuss any potential issues. Additional information may be asked to clarify the request, if necessary. The Financial Office and Program Manager must agree on the decision as to whether or not to issue an amendment. If no amendment is approved, an email will be sent from the Financial Office to document the reason behind not issuing an amendment. If an amendment is approved, the Financial Office will draft the amendment and Program Manager will review for approval before the amendment is sent to the Applicant. Once sent to the Applicant, they must sign and return the amendment to the Financial Office. Financial Office then generates a routing sheet which is signed by the Financial Office Supervisor and Division Director. Financial Office routes the subrecipient agreement to Commissioner or designee for final execution signature and returned to the Financial Office. Financial Office emails the executed amendment, updated financial report form, progress report and asset list template, when applicable, back to the applicant. Applicant is then able to move forward with the amended approved scope of work.

The **score sheet** that is used in DEMHS. The general score sheet can be found in Attachment 7. Eligibility criteria outlined in the score sheet are adjusted dependent upon the programmatic requirements. Scoring is based on a scale of one (1) to five (5) for each evaluation criteria. One (1) is not at all, three (3) is not opinion and five (5) is excellent. An average score for the application is taken. A score of 50 or below will result in an award not being issued. The Working Group may choose to ask for additional documentation to review as they see appropriate, to assist in their review and award process. Working Group approved scopes and funding are updated in the spreadsheet. Completed score sheets are kept in the Grant File.

Once final approval on the granted scopes has occurred by the Director of the Division, Financial Office and the Program Manager work together to determine programmatic and financial reporting requirements and funding source special conditions to be placed into the subrecipient agreement.

HMGP score sheet is found in Attachment 9

Chapter 3 Amendment Procedures:

What events typically trigger an amendment

A. ***State Police Amendment Selection Process****: Below is the short description on how it is determined who will receive an amendment.*

Amendment: If a sub recipient requests to change the scope of work, or requests to make modifications to the amount received or makes changes to line items on an approved budget (more than 10% of the total allocation) they must submit the request in writing for approval. The grants management unit in conjunction with the Marine Division Commander will determine if the request complies with all guidelines and directives.

B. ***DEMHS Amendment Selection Process****: Below is the short description on how it is determined who will receive an amendment.*

Occasionally, additional time or funds are needed to complete an approved mitigation project. DEMHS staff will then request a cost overrun from FEMA or an extension on the designated performance period. Once approved, DPS Finance then issues an amended agreement to the subrecipient. A sample cost overrun request to FEMA is attached for reference purposes. (Attachment 10)

Chapter 4 Programmatic Monitoring Procedures

Monitoring Criteria: please mention 1) how often 2) the number of awards reviewed and 3) who will perform programmatic monitoring. **What type of review**: Desk review, site visit or other means

A. ***State Police Monitoring Procedures****: Below is the short description on how programmatic monitoring is completed.*

General VSP

1. Each local officer is evaluated annually is the same manner as the VSP officers are. Evaluation form is attached.
2. The period of evaluation is July 1st to June 30th.
3. The individual administrating Grants collects stats quarterly for the whole task force in an excel spreadsheet and the Lieutenants collect stats monthly for each Task Force Unit they supervise.

Marine

Review performance based patrol activity sheets on a monthly basis as submitted by the sub recipient. Submission must follow a federally compliant MOU time line for the submission of required documents. The time line must match USCG federal guidelines which require a submission of activity sheets for each pay period at least once a month. (COMDTPUB P16755.3 RBS Chapter 4-Financial Administration 4.18 Personnel Compensation) Historically, there have been four awards issued by DPS for RBS funding. (Colchester Police, Grand Isle Sheriff's Department, Vermont Fish and Wildlife and Vermont Department of Motor Vehicles).The activity sheets are reviewed on a monthly basis by the State Police Marine Division to ensure the sub recipient is within the scope of work.

What type of review-(desk Review) the use of an approved RBS activity sheet as an alternative method for time distribution as required under federal guideline must be used to show an equitable distribution of F/W on water time between recreational boating safety and prohibited game warden activities.

Federal Requirements are met- Under the federal standards, all submitted activity reports are reviewed on a monthly basis at State Police Marine Division/Williston. All deliverables are entered into a database to be provided to USCG as compiled grant deliverables at the end of the grant cycle.

The use of an approved RBS activity sheet as an alternative method for time distribution as required under federal guidelines. Each pay period, or at least once a month sub recipient must prepare a time sheet that covers all employees whose costs are chargeable to more than the RBS program and includes the following information:

1. Name and Social Security number of each employee.

2. Total Salary of each employee

3. Total hours each employee worked.

4. Percent of employee's time charged to the program

5. Hours for each employee that were charged to the program

6. Amount of employees/ salary charged to the program.

7. Certification by the next higher supervisor.

B. DEMHS Monitoring Procedures*: Below is the short description on how programmatic monitoring is completed.*

The State of Vermont, Department of Public Safety (DPS), Division of Emergency Management and Homeland Security (DEMHS), as the federal grantee, is responsible for monitoring grant sub-recipients and ascertaining that all compliance and programmatic responsibilities are fulfilled.
State and local subawards are monitored in order to (1) track the progress and alignment of agencies towards the State Preparedness Report (SPR) and Core Capabilities, (2) track the support DEMHS is providing to local and State agencies for implementation of the SPR and Core Capabilities, and (3) determine whether funds designated for planning, equipment, training and exercises are being obligated and expended in accordance with DPS/DEMHS and FEMA Grants and Programs Directorate guidelines.

Monitoring provides a comprehensive picture of how Core Capabilities are progressing statewide. Monitoring assists DEMHS in identifying areas of need for subrecipient support, provides feedback on ways to improve its services to subrecipients, and illuminates the strengths and areas for improvement in subrecipients programs. Both forms of monitoring require written documentation.

Programmatic monitoring, executed through an on-site visit, focus on two areas:

1) Statutory and regulatory compliance with procurement, planning, inventory control, training and exercise actions, and

2) Goal and Objectives achievement focused on subrecipient stated operational targets, including equipment deployment.
The programmatic monitoring program places a high value on consistent, fair, transparent, and reasonable reporting and accountability by subrecipients.

Grant programs subject to DEMHS programmatic monitoring efforts include, but are not limited to State Homeland Security Program (SHSP), Operation Stone Garden Program (OSGP), and Port Security Grant Program (PSGP) from FY 2010 to present, Emergency Management Performance Grant (EMPG), Public Assistance (PA), and Hazard Mitigation Grant Program (HMGP).

The metrics, requirements, and guidelines used to conduct programmatic monitoring are found in, though not limited to, the following core documents:

- 44CFR (Emergency Management and Assistance)
- 2CFR and 2CFR 200 (Grants and Agreements)
- OMB Circular A-102 (Administrative Requirements)
- OMB Circular A-133 (Audit Requirements)
- The relevant FY Funding Opportunity Announcement/Program Guidance
- Certifications and Assurances
- Subrecipient Grant Award Agreement
- VT NIMS Implementation Plan

On-Site Monitoring

The DEMHS On-Site Monitoring process is aligned with and designed to ensure compliance with 44CFR and 2CFR, among other guidance documents. The DEMHS Programmatic Monitoring Team uses an interview template designed to comprehensively address the spectrum of content.

The Monitoring Form is the driving engine of a monitoring visit, and subrecipients ought to be familiar with all aspects of the document in order to properly prepare. Specifically, the visit matrix is categorized into 7 sections:

A- Overall/General Assessment
B- Recordkeeping
C- Equipment, with accountability and inventory control as per 44CFR Sec 13, being focus areas
D- Training
E- Exercises
F- Planning
G- National Incident Management System Progress

At least 15 subrecipients will be selected for an on-site monitoring visit each year. The determination for which entities are monitored is based upon several possible criteria:

- New subrecipient (to be monitored within the first performance year)
- Periodic routine review of subrecipient projects
- Review of specific items of interest
- Response to perceived problems or issues (i.e. not meeting goals or on the high risk list)
- Response to financial audit or programmatic monitoring exceptions
- Response to requests for assistance from subrecipients

Visits will be communicated to subrecipients via multi-media dissemination of a long term monitoring visit calendar, which will be developed annually upon receipt of federal grant funds.

A pre-monitoring analysis of the subrecipient will be conducted. This is done by monitoring personnel to determine which items should be reviewed during the site visit. The signed grant agreement(s), including Attachment B of the grant agreement, vendor invoices and correspondence, Financial Report Forms, Subgrant Progress Reports, audit findings, amendment requests, rate of expenditures, NIMS implementation data, reimbursement requests, and any additional compliance requirements should all be reviewed during the pre-monitoring analysis. The DEMHS personnel should also request a copy of the subrecipients mandated asset inventory, based on grant awards and reimbursement requests. At this time the DEMHS personnel should note any file irregularities or problems that are discovered.

A pre-visit phone call, to schedule a date and time for the monitoring visit, should be made two to three weeks in advance.. The initial contact should outline for the subrecipient the items that will be reviewed during the site visit and any preparation the

subrecipient should make prior to the visit. The phone call should be followed up by a pre-visit confirmation letter (Attachment A), preferably the same day, detailing the agreed to date and time, and items to be reviewed. It should include an agenda for the visit, a copy of the Monitoring Report Form (interview matrix) (Attachment B), and a sample CFR-compliant Asset Inventory List (Attachment E).

The visit involves discussions about project implementation such as milestones, timelines, rate of fund expenditure, project operations, performance measures, and evaluation. The visit includes interviews with key agency members, a review of documentation and equipment, and an exit interview to discuss findings and address questions or concerns. The exit interview will clarify future corrective action items for the subrecipient and highlight what will be included in the post-visit letter to the subrecipient. If any outstanding issues are identified, the subrecipient is required to submit a Corrective Action Plan within the allotted time identified in the post-visit letter, typically 45 days, identifying what steps the subrecipient is taking to resolve the issues.

The process for the site visit is as follows:

- DEMHS Authorized Personnel arrives on time, presents identification
- Introductions with key agency members
- Conducts interview(s)
    - Establishes proper contact person, working space, subrecipient working hours, parking, security
    - Authorized personnel details the monitoring process
- Reviews the Monitoring Report Form with sub-recipient
- Authorized Personnel takes notes throughout the visit on the Monitoring Report Form
- Authorized Personnel reviews equipment, takes pictures of valuable, serialized equipment and records on photo log (Attachment C).
- Conducts exit interview used to:
    - Address Findings
    - Detail follow-up requirements with deadline for compliance – Corrective Actions
    - Q&A Session with Subrecipient (Outreach). Items to cover include:
        - Proper filing of Financial Report Forms
        - Progress reporting
        - NIMS
        - VCOMM
        - New policies and procedures
        - Vehicle policy
        - Other funding sources
        - Training
        - Exercise
        - FAQ's
        - MOU templates
        - Amendment requests
        - Grant application

Upon completion of the visit, the DEMHS personnel should review the file and follow up with a post-visit results/corrective action letter (Attachment D). Findings and Corrective Action requirements will be included in this letter. If results warrant, DEMHS may place the subrecipient on the DPS Restricted Parties List. All notes and forms should be typed. The visit should be reviewed with the DEMHS Homeland Security Program Manager and Section Chief, advising of critical issues found, corrective actions, and best practices. Corrective action requirements will be followed up by the DEMHS staff, at which time the report should be finalized and the file closed.

<u>Proper Conduct for DEMHS Authorized Personnel</u>

Monitoring personnel should be professional at all times. They must always display the attributes of objectivity, courtesy, reason, focused engagement, and receptivity. If improper conduct by a subrecipient is noted by DEMHS personnel, they should document the issue and immediately address with supervisory personnel. Interviews can be conducted in an informal manner. DEMHS personnel should be courteous, good listeners, flexible, reasonable and knowledgeable.

Ensure mandatory Federal requirements are met and Review programmatic reports to provide reasonable assurance that the subrecipient administers Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved.

Sanctions: please list any sanctions your division may institute, you may wish to simply send requests to Administration to add a subrecipient to the department's Restricted Parties List.

Chapter 5 Official Grant Defined/Programmatic Monitoring File

Administration will maintain the official grant file for audit. However, the monitoring and audit files will be separate.

Examples of Programmatic Monitoring file content:

- Correspondence (including copies of email correspondence and/or notes documenting phone conversations about the grant award)
- Monitoring checklists
- Programmatic reports
- Photos (if applicable)
- Notes and/or checklists for desk reviews
- Notes and/or checklists for site visits
- Corrective action plans (if applicable)
- Any other information relevant to issuance and monitoring activities

A. State Police Monitoring File: Below is the short description of programmatic grant files.

All grant documents will be located in the Financial Office. A separate grant file with monitoring activities is not kept, except for electronic database(s) which house confidential programmatic statistical information.

B. DEMHS Monitoring File: Below is the short description of programmatic grant files..

Electronic grant files are kept on the Administration Shared Drive. Program Managers have access to these files. Hardcopy files should be archived with relevant grant history paperwork, while electronic data should be stored within the DEMHS "HSU" Programmatic Monitoring server.

List of Attachments[2]:

Attachment A- Pre-Visit Confirmation Letter
Attachment B- Monitoring Interview Matrix
Attachment C- Photo Log
Attachment D- Post-Visit Results/Corrective Action Letter
Attachment E- Sample Inventory List

[2] *This list DEMHS maintains a copy of the current attachments to their monitoring policy. These are not included in the Granting Plan as they can be updated through out the year.*

Attachment 5 VSP Drug Task Force Solicitation Letter

Vermont Drug Task Force
103 South Main Street
Waterbury, VT 05671-2101

July 17th, 20XX

Dear Chief ,

I am writing this letter to inform you that the Vermont Drug Task Force anticipates filling one opening for a local officer within this state wide unit dedicated to combating illegal drug activity in Vermont. We are seeking a qualified officer in the Southern region, whose county or municipal agency is willing to sponsor them as a full time investigator working in this multi-agency team. This position will be fully funded at no cost to your agency. If you feel you have an officer in your department that may be suitable for this specialized law enforcement work, we would very much appreciate hearing from you.

I have included a Vermont Drug Task Force application form with this letter. If you wish to make one of your officers a candidate for this position, please send me a letter describing this officer along with a completed application form. Please include a letter of interest and resume from the candidate. Please have applications submitted to me, no later than August 22, 2014.

Should you have any questions, please feel free to contact my office at Vermont State Police Headquarters. In my absence, you may also be assisted by calling Ms. XXX XXXX the NIU Business Manager, who can be reached at 802-241-XXXX.

Sincerely,

Lt. XXXX XXXXX

Narcotics Investigation Unit

Vermont State Police Headquarters

802-241-XXXX

Attachment 6 Vermont State Police Application

STATE OF VERMONT FY2015

Vermont Drug Task Force Applicant

INTRODUCTION:

This application is for use by state and local government agencies in applying for funds to place a full-time police officer within the Vermont Drug Task Force.

This application consists of several sections. Each section must be completely filled out using the applicable forms (attached). Technical assistance in completing the application is available from the Vermont Department of Public Safety. Lieutenant XXXX or XXXXX are your contacts and may be reached by calling 802-241-XXXX.

CONTENTS OF THIS APPLICATION FORM:	PAGE:
1. Cover Sheet	2
2. Instructions - Budget Detail	3
3. Budget Detail	5

Submit the original and one (1) copy of this application to:

Vermont Department of Public Safety

Vermont State Police/Drug Task Force

Attention: XXXXX

103 South Main Street

Waterbury, Vermont 05671-2101

1 TASK FORCE PROGRAM COVER SHEET

1. Name of Agency:_____

2. Contact Person (Name and Title):_____

3. Address:_____

   Town or City:_____Zip Code:_____

   County:_____

   Telephone:_____

4. Project Title: _____

5. Brief Project Description: _____

_____

6. Count(ies) Affected by the Project: _____
7. Population Affected by the Project: _____
8. Project Dates: Start:_____ End: _____
9. Requested Project Funding: _____
10. Prior Year Budget for this Service: _____
11. Current Year Budget for this Service: _____

==========

FOR REVIEWING AGENCY ONLY

==========

Date Received: _____ Reviewed by: _____

Application Status: [ ] Approved [ ] Disapproved

Project Number (for approved grants only):_____

2

DRUG TASK FORCE PROGRAM
INSTRUCTIONS - BUDGET DETAIL
SALARY AND OPERATING COSTS

PROJECT BUDGET: Please complete the detailed expenditure and source of funds information on the forms provided below. You may use additional categories if necessary.

SALARIES & BENEFITS: For any individual/position funded please complete the salary and benefit information in the following categories. All information should be provided on an **ANNUAL BASIS.**

NOTE: This information will allow us to determine the length of time this position might be funded; i.e., three, six, nine or twelve months, etc. due to available funds.

- BASE SALARY**:** This amount should represent the current annual base salary paid to an individual utilizing any existing pay plan, contract or bargaining agreement in effect. If an individual is entitled to shift differential and/or paid holidays, include that in this category, and explain what has been included: i.e., "base salary includes shift differential and twelve paid holidays." Calculate the benefits on the base salary and show them under the appropriate headings.

- OVERTIME: Calculate salary, FICA, Workers Comp and Retirement using 35 hours of overtime per month. Show those costs separately from the base salary information.

- BENEFITS: Calculate benefits using only the employer share of contributions.

Supporting documentation is required showing % of employer's costs.

. **VACATIONS:** Calculate vacation time allowable at 1 day a month from the start date of the grant with the Task Force. Sick time will be calculated in the same manner.

. COMP TIME: Grant funding does not allow us to reimburse for Comp Time used. Nor does it allow officers to accumulate Comp Time in lieu of cash, for overtime worked, while working with the task force.

NOTE: It will be necessary, if your project is funded, to keep time and attendance records. An employee may not receive compensation from two concurrent sources (double compensation). ***Additionally, grant funds are allowed for hours worked in the VTDTF but can not be used for leave time or other benefits accrued or accumulated by the employee before they became a member of the Task Force.***

OPERATING EXPENSES:

A. Meals: Meals incurred by the individual assigned to the Task Force will be reimbursed when that expense occurred away from the individual's official duty station. An approved expense account form must be completed and approved by the supervisor. Maximum amounts are those established by the state employee bargaining agreement – In-State: LUNCH NO LONGER ALLOWABLE and $12.85 for dinner (allowable if overtime was authorized and worked). Out-Of-State: $7.25 for lunch and $18.50 for dinner. No receipts required.

B. Clothing: The State will reimburse the employee for clothing which might be purchased in order to perform required functions. Maximum amount $500.00. Receipts are required along with proof of payment -- canceled check, credit card receipt, etc.

C. Gasoline: N/A

D. Office Supplies: N/A

E. Telephone: N/A

F. Other: N/A

REIMBURSEMENT REQUESTS

Supporting documentation is required with reimbursement request. All reimbursement requests must be requested on the Department of Public Safety Form. Payroll Register for time period that reimbursement is for must accompany your request. Proof of all benefits being charged is required to be kept in our files. Any changes in benefits should be forwarded to The Drug Task Force.

We are required to have a copy of your Certificate of insurance on file.

State of Vermont
Sub Recipient Grant Program
BUDGET DETAIL
Salary and Operating Costs

Position Title	**Individual**

SALARIES/BENEFITS

	Base	Overtime
Hourly Rate		
Salary		
FICA		
Retirement		
Medical		
Workers Compensation		
Dental		
Life		
Other *		
Total Salaries/Benefits		

*Please explain other expenses:

OPERATING EXPENSES

Meals	
Clothing	$500.00
Total Operating	

MATCHING FUNDS –

Not Applicable.

Attachment 7 DEMHS Score Sheet

Evaluation Criteria	**Possible Points**
Complete Vermont Sub-grant Application	5
Copy of agency's Cash Advance Policy (if applying for Limited Cash Advance)	5
Three (3) quotes or justification as to why three (3) quotes could not be obtained	5
Memorandum of Endorsement	5
Complete HSGP Asset list provided and complete	5
Roster provided	5
FCC License provided	5
Procurement Standards provided	5
Copy of Certificate of Insurance with current coverage	5
Copies of necessary permits	5
NIMS Compliant based on the 2014 Vermont NIMS Implementation Plan	5
NIBRS up to date	5
NSI up to date	5
NFIRS up to date	5
Financial risk assessment survey complete	5
Valid DUNS number and registration with SAM complete	5
The application identifies and quantifies the need for the proposed equipment (Problem Statement).	5
The application identifies the acquisition proposed to improve the need identified (Proposed Countermeasure).	5
The application identifies the link between the proposed acquisition and the identified need (Linkage).	5

The application identifies the data to be collected to evaluate the success of the acquisition (Measurement/evaluation).	5
Reviewer is confident in the applicant's proposed acquisition will contribute to progress in the State's goals and objectives.	5
The applicant has demonstrated a willingness to participate and cooperate in the State's effort to improve Capabilities.	5
The use of this subgrant opportunity will increase the applicant's ability to better deliver services to constituents.	5
Reviewer is confident in the applicant's ability to properly use, report and document the funds to be subgranted.	5
TOTAL POINTS	120

Attachment 8 Public Assistance Certification & Completion Report

Vermont Department of Public Safety
Division of Emergency Management & Homeland Security
Project Certification & Completion Report

Please send all completed requests to:
XXXXX.XXXXXX@state.vt.us
Or
Request for Public Assistance
DEMHS – Recovery Section
103 South Main St.
Waterbury, VT 05671

I certify that, to the best of my knowledge, all work and costs claimed are eligible and accurate in accordance with the State of Vermont subgrant, and all referenced project worksheets. I further certify that I am a representative of the listed applicant, and am authorized to sign this report on their behalf.	*I certify that, to the best of my knowledge, the approved work has been completed in accordance with the State of Vermont subgrant agreement, and all referenced project worksheets.*
Date & Signature of Applicant's Authorized Representative	**Date & Signature of Grantee Inspector**

Generated Date:

Applicant FIPS ID: Applicant/Subdivision Name:

PW#	Amendment #	Approved Proj. Amt.	CostShare	Cat	Bundle	WorkDone By	Projected Compl. Date	% Compl. at Insp.	Elig Amount	Actual Date Completed	Amt. Claimed by Applicant	Comments
						_____		0		_____	$_____	_____

Facility Number:		**Facility Name:**	
Location:			
Total for PWs:	$		$_____
Subgrantee Admin:	$0.00		
Grand Total:	$		

Attachment 9 HMGP Score Sheet

State Mitigation Project Review Criteria (rev. 2-12)

Project Applications

PDM-C, FMA, & HMGP Programs

Name of Reviewer:

Sub-Applicant Name/ Community/ Agency:

Priority: *(zero low to 25 points high)*

Does the project address a critical facility or important community resource?
(Critical = 5; Important But Not Critical = 3; Minimal Importance = 0)

What is the severity of past losses?
(Critical = 5; Severe = 3; Serious = 2; Minimal = 0)

Has the community been proactive in mitigating hazards, e.g. adopting a Fluvial Erosion Hazard overlay district, adopting flood plain development regulatory restrictions that exceed FEMA's minimum standards, or actively supporting substantial flood mitigation, riparian corridor land conservation, shore land protection, landslide or earthquake mitigation measures or similar activities?
(Yes = 15; Some Steps Taken = 5; Not at all = 0)

Engineering Solution: *(zero low to 10 points high)*

Is the project proposal complete and clearly defined from a technical perspective including submittal of adequate engineering technical data and/or analysis?
(Yes = 7, Partially Defined = 3, Not Well Defined = 0)

Does the application contain a recommendation from a qualified professional?
(Yes = 3, No = 0)

Effectiveness of Mitigation Strategy: *(zero low to 45 points high)*

Is the project identified in an approved Local/Regional Hazard Mitigation Plan, State Mitigation Plan, ANR River Corridor Plan and/or the Municipal Plan?
(In Approved Plan = 5; In Draft Plan = 3; Not in Plan = 0)

Does the project primarily address issues unavoidably related to recent federal or state declared disasters, and not damages due to deferred maintenance or inappropriate land use investments in hazardous areas?
(Yes= 5; No = 0)

Will the proposed solution correct the problem without having a negative impact on surrounding communities or will it substantially reduce the risk of future damage, hardship or loss resulting from a natural or man-made disaster?
(Full Solution = 10; Partial Solution = 5; Not an Appropriate Solution = 0)

Is the project primarily proactive or is it reactive; i.e. is hazard avoidance a primary element and/or the outcome of the project?
(Primarily Proactive = 10; Partially Proactive = 5; Primarily Reactive = 0)

Would completion of the project lead to risk avoidance, e.g. address a repetitive loss or chronic flooding location,
or mitigate areas affected by flooding, landslides, fluvial (riverine) erosion, ice jams or other hazards?
(Yes = 15; Partial Mitigation = 5; Little or No Mitigation = 0)

Benefit: *(zero low to 20 points high)*

Does the hazard pose a threat to human life and property or, if not addressed, would it severely impact the local community?
(Definite Significant Hazard = 5; Partial Hazard = 3; No Hazard = 0)

Is the community impacted by repetitive loss events, e.g. subject to repeated flooding, riverine erosion, landslides or other risks to public health and safety?
(Yes = 5, No = 0)

Does the project meet multiple program objectives (e.g. mitigation and environmental conservation) or are there additional potential benefits associated with this project e.g. flood control, property protection, eliminating potential isolation, water quality or riverine stabilization?
(Multiple Objectives Addressed= 10; Some Objectives Addressed = 5; No Objectives Addressed = 0)

TOTAL PROJECT SCORE (out of possible 100 points):

Attachment 10 HMGP Overrun Request Letter

Division of Emergency Management and Homeland Security Toll free: 800-347-0488 **Vermont Department of Public Safety** Phone: 802-244-8721 103 South Main Street Fax: 802-241-5556 Waterbury, VT 05671-2101 **http://vem.vermont.gov** **http://hsu.vermont.gov**

January X, 20XX

Stephen Juszczyk
DHS/FEMA Region 1- Mitigation Division
99 High Street, 6th Floor
Boston, MA 02110

Dear Mr Juszczyk,

The VT Division of Emergency Management & Homeland Security (DEMHS) and the town of XXXXX, VT respectfully request a cost overrun approval in connection with the approved acquisition of the home at XX Main Road, XXXX (re: DR XXXX- Project #XX-R). We had previously made this request on two previous occasions last year.

The current federal share for this project is $XXXX. The requested overrun amount is tied directly to the "Building Demolition, House Removal and Disposal of Septic Tank/Well" budget line item in the application which was originally estimated to be $XX,XXX. Demolition, removal of tanks, septic systems and well capping cost more than originally anticipated, in part due to lengthy delays in getting this project approved. You may recall that project approval was tied to Letter of Map Revision (LOMR) which took quite some time to get approved. The additional expense amount totaled $XXXX; the 75% federal share of this overrun amount is $XXXXX. In reviewing the invoices, DEMHS determined that this overrun amount is reasonable. The State of Vermont has sufficient remaining funds in our DR XXXX HMGP allocation to cover this increase of $XXXX. We expect CDBG funds to cover the 25% match share for the cost overrun, or $XXXX. Therefore, we are requesting FEMA approval of an additional amount of **$XXXXX** in federal share to cover the cost overrun. Approval of the overrun amount would result in a new total project federal share of **$XXXXXX**. If you have any additional questions or concerns about our cost overrun request, please let me know. Thank you once again for your consideration.

Sincerely,

XXXXX, State Hazard Mitigation Officer
Vermont Division of Emergency Management & Homeland Security (DEMHS)
103 South Main Street
Waterbury, VT 05671
Tel (802) 241-XXXX (office)
Email: XXX.XXXX@state.vt.us

Division of Emergency Management and Homeland Security Toll free: 800-347-0488 **Vermont Department of Public Safety** Phone: 802-244-8721 103 South Main Street Fax: 802-241-5556 Waterbury, VT 05671-2101 **http://vem.vermont.gov** **http://hsu.vermont.gov**