

AMERICAN RESCUE PLAN ACT (ARPA)  
STATE AND LOCAL FISCAL RECOVERY FUNDS (SLFRF)

COMPLIANCE WORKSHOP



# GRANT REQUIREMENTS



# GRANT REQUIREMENTS

## ▶ Federal Grant Requirements:

- [Code of Federal Regulations 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

Regulations provide the foundational requirements for federal financial assistance

- [ARPA SLFRF Final Rule](#)

Specific requirements to ARPA SLFRF funding

- [ARPA SLFRF Overview of Final Rule](#)

Summary of Final Rule provisions for informational purposes

## ▶ Missouri Department of Public Safety/Missouri 911 Service Board Grant Requirements:

- Contained in Subaward Agreement Articles of Agreement

# MATCH REQUIREMENTS

- ▶ 10% Match Requirement – amount listed on Subaward Agreement
  - Cash (Hard)
  - In-Kind (Soft)
    - Can be retroactive to March 2020
    - CANNOT be utilized to fulfill match requirement on any other Federal grant

# PROCUREMENT REQUIREMENTS

- ▶ Subrecipient must follow their agency's procurement policy unless the State of Missouri policy is more restrictive
- ▶ If the subrecipient does not have a procurement policy, they must follow the State of Missouri procurement policy
- ▶ [State of Missouri Revised Statutes Chapter 34, State Purchasing and Printing](#)
- ▶ [Missouri Rules of Office of Administration Division 40 – Purchasing and Materials Management](#)
- ▶ [Cooperative Procurement Option](#)
  - State Contracts
  - NASPO
  - GSA
  - Sourcewell
  - Other cooperative contracts

**\*\*If utilizing a cooperative contract, procurement documents (quotes/bids) and invoice(s) must reference the contract utilized\*\***

# PROCUREMENT REQUIREMENTS

## ► State of Missouri Procurement Guidelines

Less than \$10,000	\$10,000 - \$99,999	Greater than \$100,000
<ul style="list-style-type: none"><li>• Purchase with prudence on the open market</li></ul>	<ul style="list-style-type: none"><li>• Must be competitively bid</li><li>• Informal method is acceptable</li><li>• Minimum of 3 bids/quote</li><li>• Ex. Telephone quote, online pricing, request for quotation</li></ul>	<ul style="list-style-type: none"><li>• Formal solicitation required</li><li>• Advertised in at least two daily newspapers for general circulation at least 5 consecutive days before bids are to be opened</li><li>• May also advertise in at least 2 weekly minority newspapers &amp; provide through an electronic medium available to general public</li><li>• Post a notice in a public area of your office</li><li>• Solicit by mail or other reasonable methods generally available to the public</li><li>• OHS must approve if less than 3 bids received</li></ul>

**A single feasible source procurement of \$10,000.00 or more requires prior approval from the MO91 ISB**

# SINGLE FEASIBLE SOURCE

- ▶ Use of a single feasible source procurement of \$10,000.00 or more requires prior approval from the MO91 ISB.
- ▶ Single feasible source form can be located on [the DPS website in the Grant Applications and Forms section](#)
- ▶ If purchase is made using a single feasible source without prior approval, MO91 ISB has the right to refuse reimbursement

**Non-compliance could result in the agency being listed as high risk**



# SINGLE FEASIBLE SOURCE

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

- ▶ The item is available only from a single source;or
- ▶ The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;or
- ▶ The Office of Homeland Security expressly authorizes noncompetitive proposals in response to a written request from the local agency;or
- ▶ After solicitation of a number of sources, competition is determined inadequate



# WHO ARE YOU DOING BUSINESS WITH?

- ▶ Subrecipients are required to verify that vendors used for grant purchases are not on either the Federal Excluded Parties List System (EPLS) or State Suspended/Debarred Vendors List
  - [Federal System for Award Management](#)
  - [State of Missouri Office of Administration](#)

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



# PRIOR APPROVAL

- ▶ Some items require prior approval from the OHS and the MO91 ISB, including, but not limited to:
  - Single Feasible Source over \$10,000

# FEDERAL CONTRACT PROVISIONS

- ▶ All contracts must contain the Federal Contract Provisions as applicable
- ▶ Required by [2 CFR 200 Appendix II](#)
- ▶ Required provisions are available on the MO91 ISB website [www.missouri911.org](http://www.missouri911.org)

# FEDERAL CONTRACT PROVISIONS

- ▶ A – Contracts more than the simplified acquisition threshold (\$250,000.00) must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.
- ▶ B - Contracts in excess of \$10,000 must address termination for cause and for convenience
- ▶ C - Contracts that meet the definition of federally assisted construction contract must include the equal opportunity clause
- ▶ D - All prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act
- ▶ E - All contracts in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with [40 U.S.C. 3702](#) and [3704](#), as supplemented by Department of Labor regulations ([29 CFR Part 5](#))
- ▶ F – If entering into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that “funding agreement,” the agency must comply with the requirements of [37 CFR Part 401](#), “Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements,” and any implementing regulations issued by the awarding agency.

# FEDERAL CONTRACT PROVISIONS

- ▶ G – Contracts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act ([42 U.S.C. 7401-7671q](#)) and the Federal Water Pollution Control Act as amended
- ▶ H – A contract award must not be made to parties listed on the government-wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at [2 CFR 180](#) that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), “Debarment and Suspension.”
- ▶ I – Byrd Anti-Lobbying Amendment ([31 U.S.C. 1352](#)) - Contractors that apply or bid for an award exceeding \$100,000 must file the required certification.
- ▶ J – [200.323 Procurement of recovered materials](#)
- ▶ [K – 200.216 Prohibition on certain telecommunications and video surveillance services or equipment](#)
- ▶ L – [200.322 Domestic preferences for procurements](#)

# Law Enforcement Agency Requirements

- ▶ Must submit MIBRS crime incident reports to DPS as prescribed by DPS and submit any other info as required by DPS.
- ▶ If an agency is not in compliance with Section 43.505 RSMo they can only apply for grant funds to assist in becoming compliant. Non-Compliance is defined for grant-eligibility as an LE agency that has not submitted NIBRS reports for 3 or more months since January 1, 2022.
- ▶ Vehicle Stops, must be in compliance with Section 590.650 RSMo (Racial Profiling) for the duration of the project period.
- ▶ Use of Force reporting – must be in compliance with Section 590.1268 RSMo relating to use of force incident reporting standards and procedures and publication of report data and analysis reports
- ▶ Federal Equitable Sharing Funds – must be in compliance with Section 513.653 RSMo relating to participation in the federal forfeiture system and the reporting of proceeds to the MO State Auditor.
- ▶ ARPA Data reporting – must agree to submit any data or statistical reports required for the ARPA program.
- ▶ Body Armor – if any ARPA dollars are spent on body armor must meet latest NIJ ballistic or stab standards and must be made in the US.
- ▶ Body-Worn Camera – if ARPA dollars are spend on body-worn cameras there must be written polices and procedures in places related to usage, data storage and access, privacy considerations, training, etc.

# Law Enforcement Agency Requirements

- ▶ Rap Back Program – compliance with Section 590.030 RSMo (Basic Training requirements for peace officers) has to enroll in state and federal rap back programs, and requires fingerprints and enrollment for commissioned officers is maintained.
- ▶ Custodial Interrogations – must be in compliance with Section 590.700 RSMo and have written policies to record custodial interrogations of suspects related to subsection 2.

# All Agency Requirements

## Improving Access to Services for Persons with Limited English Proficiency

- ▶ Applicants and recipients are encouraged to ensure their PSAP has access to 24/7 language interpretive services like Language Line, etc.



# AUDIT REQUIREMENTS

- ▶ State and local units of government, institutions of higher education, and other nonprofit institutions, must comply with the organizational audit requirements of [2 CFR Part 200 Subpart F](#), Audit Requirements
  - Subrecipients who expend \$750,000 or more of federal funds during their fiscal year are required to submit a single organization wide financial and compliance audit report (single audit) to the [Federal Audit Clearinghouse](#) within 9 months after the close of each fiscal year during the term of the award
    - Expended funds include all Federal funds, not just ARPA SLFRF funds

# INVENTORY MANAGEMENT

- ▶ Equipment is defined as tangible, personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost of \$1,000 or more
- ▶ Entities may have a lower acquisition cost in their procurement policy. If so, they **MUST** use the most stringent policy
- ▶ **ALL** equipment items **MUST** be tracked

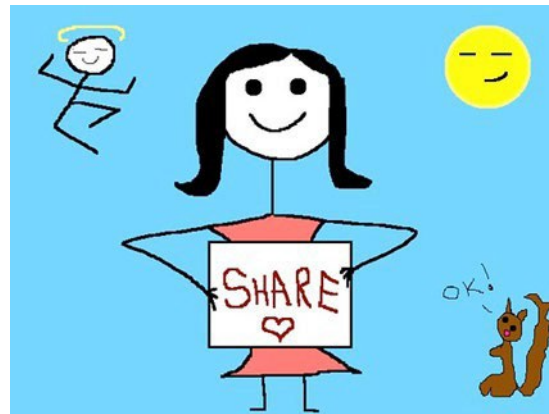
# INVENTORY MANAGEMENT

- ▶ All equipment purchased with ARPA SLFRF funds **MUST** be tagged
- ▶ All tags must state:

Purchased with U.S. Department of  
Treasury Funds

# INVENTORY MANAGEMENT

- ▶ Equipment must be used in the program or project it was acquired for as long as needed
- ▶ During the time that equipment is used on the project or program for which it was acquired, the non-Federal entity must make the equipment available for use on other projects or programs currently or previously supported by the Federal government, provided the use will not “interfere” with the work on the project or program for which it was originally acquired



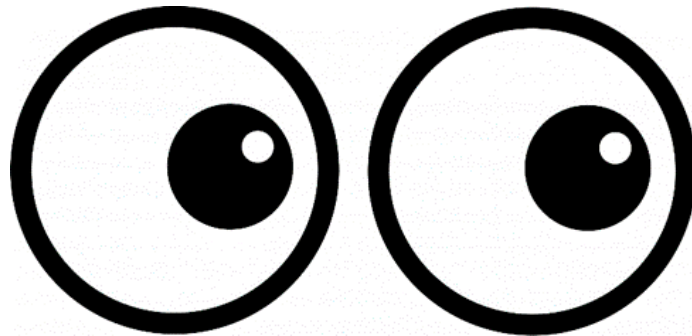
# INVENTORY MANAGEMENT

- ▶ When no longer needed, the equipment may be used in other activities supported by the Federal awarding agency, in the following priority:
  - Activities from the Federal awarding agency, which funded the original project
  - Activities under Federal awards from other Federal awarding agencies
- ▶ When acquiring replacement equipment, the non-Federal entity may use the equipment to be replaced as a trade in or sell the property and use the proceeds to offset the cost of the replacement property

# INVENTORY MANAGEMENT

## ▶ Subrecipients MUST:

- Have an inventory management system and maintain effective control
- Have a control system in place to prevent loss, damage and theft
- Investigate all incidents
- Have adequate maintenance procedures to keep property in good condition



# INVENTORY MANAGEMENT

- ▶ Equipment must be protected against loss, damage and theft
  - Per [2 CFR 200.310](#): The non-Federal entity must, at a minimum, provide the equivalent insurance coverage for real property and equipment acquired or improved with Federal funds as provided to property owned by the non-Federal entity
- ▶ Investigate all incidents of loss, damage, theft, and report to the OHS within 30 days of the incident
- ▶ Equipment must be maintained to keep it in mission capable (operational) condition

# INVENTORY MANAGEMENT

- ▶ Required to maintain inventory form for all equipment purchased with ARPA SLFRF funds
- ▶ Equipment is added to OHS inventory at the time of claim approval
  - Entities are required to submit inventory form at time of claim request when equipment items are purchased
- ▶ Physical inventory **MUST** be taken and results reconciled once every two years
  - Next inventory will be due **October 1, 2024**
  - OHS or MO91 ISB will send list of your agency's inventory for verification





# INVENTORY MANAGEMENT

▶ Equipment inventory **MUST** be one item per line and include the following:

- Region
- County
- Fiscal Year
- Grant Program
- Grant Award Number
- Description of Equipment
- EGMS/WebGrants Line Item Number
- Manufacturer
- Model
- Identification number
- Title holder
- Quantity
- Individual Item Cost
- % of Federal Participation in the Cost
- Date of Delivery
- Physical Location (MUST be the physical address)
- Use (Local, Regional, National, Statewide)
- Readiness Condition (Mission Capable/Not Mission Capable)
- Final Disposition
- Date of Final Disposition
- Final Disposition Sale Price
- Contact Name
- Contact Email
- Contact Phone Number

# INVENTORY MANAGEMENT

- ▶ When original or replacement equipment acquired with ARPA SLFRF funds is no longer needed for the original project or program, the equipment may be retained, sold, or disposed, if it is not needed in any other ARPA SLFRF sponsored project or program
- ▶ Disposition requests should be submitted on a timely basis. Disposition requests should not be held and submitted for approval at the time of the bi-annual physical inventory

# INVENTORY MANAGEMENT

- ▶ Subrecipients must request approval from the OHS prior to disposing of equipment
- ▶ To request approval to dispose of equipment the Equipment Disposition Form must be completed and emailed to Kaycee Nail at [Kaycee.Nail@missouri911.org](mailto:Kaycee.Nail@missouri911.org)
- ▶ Equipment Disposition Form found on the OHS website in the [Grant Applications and Forms](#) section

# INVENTORY MANAGEMENT

- ▶ Equipment with a per item fair market value of less than \$5,000 may be retained, sold, or disposed with no further obligation when approval is given by OHS or MO9 I ISB
- ▶ Equipment with a per item fair market value of \$5,000 or more may be retained or sold



# INVENTORY MANAGEMENT

- ▶ If sold, the Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from the sale by the Federal awarding agency's percentage of participation
  - Example: Agency X wants to sell Item A, which was 90% funded with ARPA SLFRF funds and 10% funded with local funds. The fair market value for Item A is \$10,000.00. The Federal awarding agency would be entitled to \$9,000.00 of the proceeds and the local agency would be entitled to \$1,000.00

# REIMBURSEMENT REQUESTS (CLAIMS)

CLAIMS  
101

- ▶ Must incur an allowable expense or receive an invoice, make payment or show in-kind match, and seek payment within 6 months of the invoice date
- ▶ Supporting documentation must be submitted with each claim
- ▶ Incomplete claims could result in a delay of payment. It is the requesting agency's responsibility to complete the necessary changes
- ▶ Requests for reimbursement must be submitted to the MO9 IISB with required supporting documentation

# REIMBURSEMENT REQUESTS (CLAIMS)

CLAIMS  
101

- ▶ Attach required supporting documentation to the payment request by selecting the “Attach File” option

*Add screenshot and instructions for how to send required documentation to submittable*



# REIMBURSEMENT REQUESTS (CLAIMS)

## ▶ Travel/Training Supporting Documentation

- Vendor Invoice
- Proof of Payment (copy of cancelled check, credit card statement, bank statement) or demonstration of In-kind match
- Agenda/Announcement
- Proof of attendance (sign-in sheet/roster/certificate, etc.)

\*Meals, mileage, and lodging cannot exceed the state of Missouri rates established by the Missouri Office of Administration. Current rates can be found at: <https://acct.oa.mo.gov/travel-portal>



# REIMBURSEMENT REQUESTS (CLAIMS)

## ▶ Equipment Supporting Documentation

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$1,000

- Vendor Invoice
- Proof of payment (i.e., copy of cancelled check, credit card statement, bank statement) or demonstration of in-kind match
- Proof of delivery/completion (i.e., signed packing slip, receipt, or signed statement in writing indicating items delivered)
- Purchase order, if one was created or referenced on an invoice
- Equipment Inventory Form must be completed for each piece of equipment
  - If you purchased more than one of the same item, they must be listed separately on the equipment inventory form

# REIMBURSEMENT REQUESTS (CLAIMS)

## ▶ **Supplies Supporting Documentation**

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

# REIMBURSEMENT REQUESTS (CLAIMS)

## ▶ Contractual Services Supporting Documentation

- Vendor Invoice
- Proof of payment (copy of cancelled check, credit card statement, bank statement)
- Proof of delivery (signed statement in writing indicating goods/services received)
- **Copy of signed contract must be submitted with first claim**
- Other documentation required by contract (milestone reports, time and effort)
- **\*\*If a contractor is requiring a down payment to begin project activities, the contract must reference this requirement for payment to be considered\*\***

# REIMBURSEMENT REQUESTS (CLAIMS)

## ▶ In-Kind Match Supporting Documentation

- Proof of expense (vendor invoice/salary documentation/fringe benefit documentation, etc.)
- Proof of payment (copy of cancelled check, credit card statement, bank statement, payroll journal, check stub, etc.)
- Proof of delivery (signed statement in writing indicating goods/services received, signed packing slip, timesheets)

# REIMBURSEMENT REQUESTS (CLAIMS)

## ▶ **Advance Payment**

- Advance payment is defined as funds given to an entity in advance of the entity incurring the debt. For example, if an entity orders a piece of equipment and requests reimbursement prior to paying the vendor's invoice, receipt of funds would be considered an advance payment
  - Some situations, local cash flow makes payment for large invoices difficult
  - OHS has agreed to accept requests for funds from entity's as soon as a vendor submits their invoice and the entity has received goods or services

## ▶ Contact Kaycee Nail or Scott Cason for detailed instructions to request an advance payment

- Contact information can be found at the conclusion of the training



# QUARTERLY REPORTING

- ▶ To complete reporting, select “Reporting” in Submittable
  
- ▶ *Insert screenshots and requirements from submittable system here*

# QUARTERLY REPORTING

- ▶ *Add additional instructions to complete the quarterly reporting in submittable*



# GRANT FILE

- ▶ All grant records shall be retained by the entity for:
  - At least 5 years from the end of the state fiscal year in which the grant closes or following notification by the awarding agency that the grant has been programmatically and fiscally closed or at least 5 years following the closure of the subrecipient's audit report covering the entire award period, whichever is later
- ▶ Entity should maintain grant file with grant documentation including but not limited to:
  1. Fully-executed Subaward Agreement
  2. Claims
  3. Quarterly Reports
  4. Monitoring Reports
  5. Relevant Grant Correspondence
  6. Procurement Documents
  7. Disposition of Equipment Forms
  8. Inventory

# GRANT CLOSEOUT

- ▶ Grant Period of Performance ends 06/30/2026
- ▶ Final Claims and Reports are due 45 days after the end of the period of performance (08/14/2026)

# MONITORING

- ▶ The MO9I ISB acts as a pass-through entity and is subject to the requirements of pass-through entities guided by 2 CFR 200
- ▶ [2 CFR 200.332 \(d\)](#) states, “All pass-through entities must monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved”
- ▶ Types of Monitoring
  - Desk – Review that is completed by the MO9I ISB at the MO9I ISB’s office
  - On-Site – Review that is conducted by the MO9I ISB at the entity’s agency



# MONITORING

## ▶ Scheduling

- Agreed upon date between MO9I ISB and subrecipient
- Given at least 30 days notice

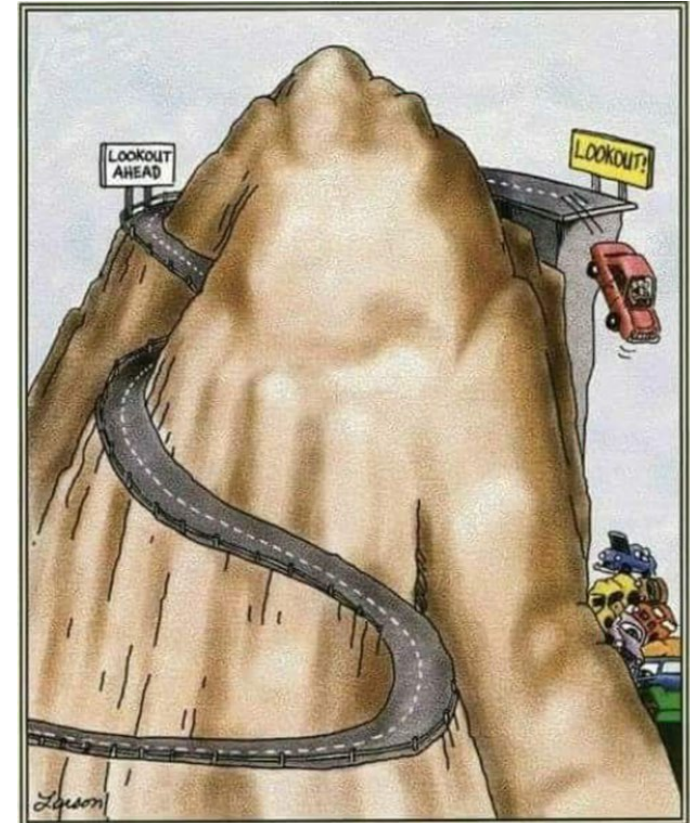
## ▶ Corrective Actions

- If observations are made, at least 30 days will be allowed to complete and submit necessary corrective actions



# MONITORING

- ▶ Monitoring is NOT an audit
- ▶ MO911SB is NOT out to catch you doing something wrong – we are there to HELP correct areas of noncompliance to prevent audit findings
- ▶ Chance to provide technical assistance and answer questions



QUESTIONS?



# MO911 SB CONTACTS

**Kaycee Nail**

Grant Supervisor

[Kaycee.Nail@missouri911.org](mailto:Kaycee.Nail@missouri911.org)

**Scott Cason**

NG911 Manager

[Scott.Cason@missouri911.org](mailto:Scott.Cason@missouri911.org)

**Brian Maydwell**

Executive Director

[Brian.Maydwell@missouri911.org](mailto:Brian.Maydwell@missouri911.org)