



## NEBRASKA EMERGENCY MANAGEMENT AGENCY

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**Issued By:** Bryan Tuma  
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### I. POLICY

- A. The Nebraska Emergency Management Agency (NEMA), as the State Administrative Agency (SAA) and primary recipient of homeland security grant funds has full responsibility for the conduct of the projects or activity funded and for the results achieved. NEMA, as grant recipient, must monitor the performance of the projects to assure adherence to performance goals, time schedules or other requirements as appropriate to the projects or the terms of the grant agreement. NEMA is responsible for monitoring the activities of and pass-through requirements to any grant sub-recipients.
- B. Purpose of Monitoring Sub-recipient projects must be monitored in order to track the progress against their work plans,
1. Monitoring tracks the support NEMA is providing to sub-recipients for implementation of their projects,
  2. Determines whether planning, equipment, exercise, administrative, and training grant funds are being obligated and expended in accordance with DHS/FEMA/Grant Programs Directorate, guidelines, and terms & special conditions.
  3. Ensure that NEMA Grants Management files are current, and reflect any and all changes to a sub-recipient.
- C. Fiscal and programmatic monitoring will be completed by two (2) methods; On-Site monitoring and Office Based monitoring. Monitoring will assist in identifying areas where a sub-recipient requires continued support from NEMA, thus providing feedback to NEMA which can be used to improve the agency's services. Both forms of monitoring will require written documentation (Monitoring Memorandum) to be completed by NEMA Grants staff. The original Monitoring Memorandum will be mailed to the; Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, with a copy going to the Emergency Manager or Grant Administrator, as well as a copy circulated through the appropriate NEMA channels. Prior to completing any monitoring effort, it is important to review other recent monitoring activities, including but not limited to; grant close-out progress, the type of grant, any grant databases, and previous Monitoring Memoranda.
- D. Grant programs subject to these monitoring efforts include:
1. EMPG – Emergency Management Planning Grant
  2. HMEP – Hazardous Materials Emergency Preparedness
  3. HSGP Homeland Security Grant Program

## II. PROCEDURE

### A. On-Site Monitoring

1. The NEMA Grants Monitor will work closely with NEMA Grants Administrator and the Division Supervisors in scheduling on-site monitoring visits to sub-recipients during each grant cycle. A minimum of 75% of the HSGP and EMPG grant sub-recipient will be monitored for compliance within their respective grant cycles, through both on-site monitoring and office based monitoring.
2. Review of NEMA Grant Files
  - a. Using the Monitoring Report form as a guide, the Grants Monitor should go through the selected NEMA grant files to familiarize themselves with each grant's projects/activities. In addition to reviewing the physical hard file, the Grants Management System (GMS) electronic database should also be reviewed. If the sub-recipient received more than one grant, each one should be reviewed via this process, and all grants should be monitored during the same on-site visit; however, a separate Monitoring Report form should be used for each grant.
  - b. The financial reports in the file reflect the amount of money the sub-recipient has obligated and expended, providing an indication of activity with grant funds. The lack of any obligations or 'draw downs indicates possible inactivity, which should be discussed during the monitoring visit. The Grants Monitor should ensure that official copies of all grant extensions are documented in the NEMA grant file.
  - c. Additionally, the Grants Monitor review equipment procurement from GMS prior to the visit; as well as, any expenditure toward other cost categories covered in each grant (e.g.; administrative, exercises, training, and/or planning).
3. On-Site Visit Preparation
  - a. Sub-Recipients are selected for monitoring in a given grant cycle based on:
    - 1) Whether or not they were monitored during the previous grant cycle
    - 2) Whether or not there were any problems, issues, or additional guidance that needed to be addressed from that previous visit
    - 3) Whether or not a jurisdiction is receiving more than one grant, and
    - 4) Size of the award(s) received in a jurisdiction
  - b. The Grants Monitor will contact the sub-recipient's Emergency Manager, Grants Administrator, or Fiscal Officer via e-mail, to choose a date and time from options given for the on-site visit, attaching the Monitoring Report form for their review. Once a date has been established, a formal letter with the date and time of the on-site visit is sent to the Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, with a copy going to the Emergency Manager, Grant Administrator, or Fiscal Officer.
  - c. In a subsequent e-mail to the Emergency Manager, Grant Administrator, or Fiscal Officer, prior to the visit, the Grants Monitor will request that items in the following areas be made available for review, if allowed by grant guidelines (i.e.; Personnel/Direct Labor not allowed in HSGP);
    - (1) Employee Reimbursement documentation
    - (2) Equipment documentation, inventory list, and physical inspection of equipment
    - (3) Fiscal documentation
    - (4) NIMS Compliance (training records)
    - (5) LEOP (updated annually or revised at the five year mark)
    - (6) Other Direct Costs documentation
    - (7) Personnel/Direct Labor documentation
    - (8) Supplies & Materials documentation
    - (9) Training/Meeting/Conference Expenses documentation
    - (10) Travel/Vehicle Mileage documentation
    - (11) Grant Reporting Requirements

- d. The e-mail should complete with; “Should you have any questions or concerns, please give me call.” Giving the Emergency Manager, Grant Administrator, or Fiscal Officer, prior to the visit an opportunity to address any aspects of the upcoming on-site monitoring visit.

#### 4. On-Site Visit

- a. For programmatic purposes, the Grants Monitor should ensure that the sub-recipient is prepared to provide a general update during the visit of the progress being made within their jurisdiction with regard to equipment procurement, exercise development – implementation – participation, training, and technical assistance, and whether they are meeting the goals and objectives described in the State Homeland Security Strategy. Inquire whether purchased equipment has been deployed, and if additional training is needed on specialized equipment prior to its use.
- b. Equipment associated with ‘specialty teams’ must have training records on site for verification.
- c. Any discrepancies, administrative and financial issues (use of planning funds, delinquent reports, missing documentation, special conditions, etc.) should be discussed with the Emergency Manager, Grant Administrator, or Fiscal Officer, separately from meetings planned with other jurisdictional representatives.
- d. Separate meetings with jurisdictional officials and emergency response personnel should focus on the support those areas have received from NEMA (and other Federal, State, and Local) resources, and how those resources have enhanced response capabilities.
- e. Review the documentation you have received for completeness, to ensure that all required items have been covered prior to ending the on-site visit.

#### 5. Post Site Visit Monitoring Memorandum and Follow-Up Correspondence

- a. Within ten (10) business days of the monitoring on-site visit, the Grants Monitor should send an e-mail thanking the sub-recipient for the time spent for the visit, and remind the Emergency Manager, Grant Administrator, or Fiscal Officer, of any subsequent documentation that had been agreed upon to be e-mailed or faxed within a given timeframe.
- b. Also within ten (10) business days of the monitoring on-site visit, the Grants Monitor must prepare and send the original Monitoring Memorandum to; the Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, with a copy going to the Emergency Manager, Grant Administrator, or Fiscal Officer, as well as a copy circulated through the appropriate NEMA channels.
- c. If the sub-recipient has received more than one grant (multiple Monitoring Reports, one for each grant), only one Monitoring Memorandum should be prepared which will include all of the grants’ results from the on-site visit. This information should be defined within the sections of the memorandum, and clearly delineated which grant is being discussed and the outcome/result.
- d. The Monitoring Memorandum should reflect any notice given to the sub-recipient of delinquent reports, failure to submit proper documentation, quotes, purchase orders, and any discussion of outstanding special conditions. Additionally, a brief synopsis of equipment, training, exercise, and technical assistance activities should also be included.
- e. All written reports shall be on file with NEMA. However, if the sub-recipient noted any problems or issues regarding implementation of any part of the program, the Grants Monitor should annotate what steps the sub-recipient is taking to resolve the situation in the Monitoring Memorandum.

- f. The sub-recipient is given sixty (60) days from the receipt of the Monitoring Memorandum to submit any missing, incomplete, or needed documentation or equipment verification to the NEMA Grants Monitor. Should this not occur, a 'Findings' Letter is then sent to the Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, with a copy of the Monitoring Memorandum and an additional thirty (30) days to rectify the issue(s). Should this still garner no result, at the end of the thirty (30) days a 'Letter of Non-Compliance' is sent to the Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, informing them that their grant funds have been frozen and there will be no further reimbursements until the issue(s) is settled.

#### B. Office Based (Desk Review) Monitoring

1. The NEMA Grants Monitor will work closely with NEMA Grants Administrator and the Division Supervisors in scheduling on-site monitoring visits to sub-recipients during each grant cycle. A minimum of 75% of the HSGP and EMPG will be monitored for compliance within their respective grant cycles, through both on-site monitoring and office based monitoring.
2. For a sub-recipient to be selected for this type of monitoring, they must have had three (3) or more on-site visits that demonstrate a pattern of proper grant management. Office Based Monitoring can only take place if this condition is met. Should a sub-recipient receive a HSGP or EMPG award and have not had one before in addition to their established grant, an on-site visit would be required, with the possibility of an office based monitoring to take place in the next grants cycle.
3. Review of NEMA Grant Files
  - a. Using the Monitoring Report form as a guide, the Grants Monitor should go through the selected NEMA grant files to familiarize themselves with each grant's projects/activities. In addition to reviewing the physical hard file, the Grants Management System (GMS) electronic database should also be reviewed. If the sub-recipient received more than one grant, each one should be reviewed via this process, and all grants should be monitored during the same on-site visit; however, a separate Monitoring Report form should be used for each grant.
  - b. The financial reports in the file reflect the amount of money the sub-recipient has obligated and expended, providing an indication of activity with grant funds. The lack of any obligations or 'draw downs' indicates possible inactivity, which should be discussed during the monitoring visit. The Grants Monitor should ensure that official copies of all grant extensions are documented in the NEMA grant file.
  - c. Additionally, the Grants Monitor review equipment procurement from GMS prior to the visit; as well as, any expenditure toward other cost categories covered in each grant (e.g.; administrative, exercises, training, and/or planning).
4. Contact Sub-Recipient
  - a. Sub-Recipients are selected for monitoring in a given grant cycle based on:
    - (1) Were they monitored during the previous grant cycle
    - (2) Were there any problems, issues, or additional guidance that needed to be addressed from that previous visit
    - (3) Whether or not a jurisdiction is receiving more than one grant
    - (4) Are they a MOU HazMat grant recipient, and
    - (5) Size [large or small] of the award(s) received in a jurisdiction
  - b. The Grants Monitor will contact the sub-recipient's Emergency Manager, Grants Administrator, or Fiscal Officer in writing, via e-mail, to choose a date and time from options given for the office based monitoring, attaching the Monitoring Report form for their review. This differs slightly from an on-site which is completed on a particular day with an established time. The office based monitoring will take place over the course of a week, with the last day of the week (at a scheduled time) used to complete the Monitoring Report over the telephone with the Emergency Manager, Grant

Administrator, or Fiscal Officer. Once the week has been established, a formal letter with this information is sent to the Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, with a copy going to the Emergency Manager, Grant Administrator, or Fiscal Officer.

- c. In a subsequent e-mail to the Emergency Manager, Grant Administrator, or Fiscal Officer, prior to the monitoring, the Grants Monitor will request that item in the following areas be e-mailed or faxed for review, as applicable (i.e.; Personnel/Direct Labor not allowed in HSGP);
  - (1) Employee Reimbursement documentation
  - (2) Equipment documentation, inventory list, and physical inspection of equipment
  - (3) Fiscal documentation
  - (4) NIMS Compliance (training records)
  - (5) LEOP (updated annually or revised at the five year mark)
  - (6) Other Direct Costs documentation
  - (7) Personnel/Direct Labor documentation
  - (8) Supplies & Materials documentation
  - (9) Training/Meeting/Conference Expenses documentation
  - (10) Travel/Vehicle Mileage documentation
  - (11) Grant Reporting Requirements
- d. The e-mail should complete with; "Should you have any questions or concerns, please give me call." Giving the Emergency Manager, Grant Administrator, or Fiscal Officer, prior to the monitoring an opportunity to address any aspects of the upcoming office based monitoring.

#### 5. Monitoring

- a. For programmatic purposes, the Grants Monitor should ensure that the sub-recipient agency is prepared to provide a general update during the visit of the progress being made within their jurisdiction with regard to equipment procurement, exercise development – implementation – participation, training, and technical assistance, and whether they are meeting the goals and objectives described in the State Homeland Security Strategy. Inquire whether purchased equipment has been deployed, and if additional training is needed on specialized equipment prior to its use. NEMA will place emphasis on the type of equipment purchased the location of that equipment, and any training records which document levels of proficiency in the use of said equipment.
- b. Equipment associated with 'specialty teams' must have training records for verification.
- c. Any discrepancies, administrative and financial issues (use of planning funds, delinquent reports, missing documentation, special conditions, etc.) should be discussed with the Emergency Manager, Grant Administrator, or Fiscal Officer.
- d. Review the documentation you have received for completeness to ensure you have covered all required items prior to ending the office based monitoring.
- e. All documents should be e-mailed, faxed, or regular postal mail to the Grants Monitor to facilitate this process. Additionally the Grants Monitor can ask for photographic proof as to deployment of equipment, or verifying communications equipment (laptops, Toughbooks, radios, pagers, tower equipment, etc.)

#### 6. Post Office Based Monitoring Memorandum and Follow-Up Correspondence

- a. Within ten (10) business days of the monitoring, the Grants Monitor must prepare and send the original Monitoring Memorandum to; the Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, with a copy going to the Emergency Manager, Grant Administrator, or Fiscal Officer, as well as a copy circulated through the appropriate NEMA channels.
- b. If the sub-recipient has received more than one grant (multiple Monitoring Reports, one for each grant), only one Monitoring Memorandum should be prepared which will

include all of the grants' results from the monitoring. This information should be broken up within the sections of the memorandum, and clearly delineated which grant is being discussed and the outcome/result.

- c. The Monitoring Memorandum should reflect any notice given to the sub-recipient of delinquent reports, failure to submit proper documentation, quotes, purchase orders, and any discussion of outstanding special conditions. Additionally, a brief synopsis of equipment, training, exercise, and technical assistance activities should also be included.
- d. All written reports shall be on file with NEMA. However, if the sub-recipient noted any problems or issues regarding implementation of any part of the program, the Grants Monitor should annotate what steps the sub-recipient is taking to resolve the situation in the Monitoring Memorandum.
- e. The sub-recipient is given sixty (60) days from the receipt of the Monitoring Memorandum to submit any missing, incomplete, or needed documentation or equipment verification to the NEMA Grants Monitor. Should this not occur, a 'Findings' Letter is then sent to the Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, with a copy of the Monitoring Memorandum and an additional thirty (30) days to rectify the issue(s). Should this still garner no result, at the end of the thirty (30) days a 'Letter of Non-Compliance' is sent to the Chair of a County Board, Chair of a Regional or Emergency Management Board, Mayor, or Agency Head, informing them that their grant funds have been frozen and there will be no further reimbursements until the issue(s) is settled.

#### C. Technical Assistance

1. The Grants Monitor should also ask about any specific problems the sub-recipient may be having with the grant processes and provide that technical assistance. Should the issue be outside the scope of the Grants Monitor's expertise, the Monitor should inform the sub-recipient that the NEMA Grant Administrator can be contacted at any time to assist in any area of the grant process, and recommend who to contact for help.
2. If the monitoring process should reveal potentially grave discrepancies or questionable activities, the Grants Monitor should inform the NEMA Grants Administrator immediately, who will discuss the issue(s) with the NEMA Assistant Director. Once discussions have been completed, the Grants Administrator will then contact the sub-recipient with a plan for correcting the issue(s).