

## NIAGARA FALLS POLICE DEPARTMENT

### General Order

<b>DATE:</b> 09/19/2013	<b>SUBJECT:</b>  Homeland Security Grant Administration and Procedures	<b>NUMBER:</b> 108.10
<b>RESCINDS:</b> None		<b>NUMBER OF PAGES:</b> 6

I. Purpose:

- A. To create a formal policy on the handling of Homeland Security grant funding awarded. This policy is designed to provide a process of applying, receiving and administering grant funding awarded by the Division of Homeland Security and Emergency Services.

II. Policy:

A. Guidelines:

1. The Niagara Falls Police Department is responsible for the administration of awarded Homeland Security Funds.
2. This guideline is designed to provide a step by step process of applying, receiving and administering Homeland Security funds.

B. Application:

1. There are many grant programs in which the NFPD applies for through the Division of Homeland Security and Emergency Services. When the NFPD is made aware of the programs available, the Superintendent of Police and appropriate Command Staff will decide whether an application will be drafted to apply for funds.
2. Once a decision has been made, the Administrative Lieutenant/Grant Writer will proceed with the Grant Application procedure, regardless of amount.
3. Information will be solicited from appropriate staff and agencies to complete the application.
4. If the NFPD is applying for a grant renewal, review with the Superintendent of Police only is required.

5. If applying for a new grant, the NFPD must first forward the application to the City Administrator's office. Once approval is obtained from the City Council, the application can be submitted through the E-Grants System.
6. Per the resolution, an account will be established for the distribution of funds. The City will ensure that the grant funds are not commingled with other sources of funding by establishing a separate sub-department that is specific to each grant, or in the case of a grant funding a specific capital project in its entirety, establishing a separate capital account specific to that grant.
7. No items will be purchased until a signed contract is executed and on file with the Superintendent of Police and City Administrator.

C. Procurement:

1. Once all application materials are in place and accounted for the process of procurement can begin. All procurements will adhere to all applicable Federal, State, and DHSES Contract requirements and in accordance with the City of Niagara Falls Procurement Policy. Written justification and documentation for all procurements must be maintained on file, and made available upon request. If questions about the procurement of goods and services arise the questions will be forwarded to the Purchasing Department for review and resolve.
2. Any purchases made will include any grant specific requirements including but not limited to proving reasonableness of price. A purchase order requires no formal written quote if the cost of the item is \$500 or under and the purchase order total for all items is less than \$1,500. A purchase order requires three verbal quotes if cost of an item is between \$501 to \$3,000 and/or the total dollar amount of all items on the purchase order is between \$1,501 and \$3,000. A purchase order requires three written quotes if the total amount of all items on the purchase order is between \$3,001 and \$9,999. Any items or purchase order \$10,000 and over require Competitive Sealed Bid or a Request for Proposal.
3. Purchase orders will include state contract award letters and the company information.
4. If the item to be purchased has unique requirements, thereby limiting the purchase to a **sole source** vendor/bidder, as defined in the City of Niagara Falls Procurement Policy, then all documentation substantiating such justification must be presented to DHSES for approval. See attached Justification for Non Competitive

Procurement. Copies of all documentation must be kept in the grant folder as well as provided to the City of Niagara Falls Purchasing Department for final approval before proceeding with the procurement process.

5. A copy of the proposal(s) or bid document(s) will be stamp dated and initialed by the Superintendent of Police or Designee when received and a copy will be kept on file at the NFPD.
6. Pre-approval of all procurement documents will be reviewed prior to award. All questions about the procurement of goods will be responded to by the Superintendent of Police or Designee. Once the City Council has awarded the contract with a resolution number of the Grant Acceptance and all documents are in place, for example, insurance certification, bonding, if required, the purchase order can be generated.
7. In order for a purchase to occur, a City of Niagara Falls Purchase Order must be drafted and approved. The Purchasing Director signs all purchase orders and forwards a copy of the purchase order to the requesting department. The purchase order can now be sent to the appropriate vendor(s).

D. Receipt of Goods and Equipment:

1. All items will be ordered and shipped to the address provided on the purchase order or the address defined in the purchase contract with the City of Niagara Falls. When the items arrive or are installed, a member of the NFPD will verify the items and check it in accordance with the packing slip or contract. If any errors occur the items will not be accepted until it can be reconciled with the vendor.
2. All equipment will be placed in the fixed asset system established by City of Niagara Falls fixed asset policy as well as labeled "Purchased with Homeland Security Funds". The following information will be recorded by award and filed with NFPD Grants Administrator:
  - a. Description of the property
  - b. Serial Number or other identification number
  - c. The source of the property
  - d. Who holds title
  - e. The acquisition date
  - f. Cost of property
  - g. Percentage of federal participation in the cost of the property
  - h. Location of equipment
  - i. Use and condition of the property

- j. Any ultimate disposition data including the date of disposal and sale price of the property
  - 3. Any equipment, furniture or supplies or other property purchased pursuant to the DHSES Agreement is deemed to be the property of the City of Niagara Falls, except as may otherwise be governed by federal or State laws, rules or regulations or stated in the DHSES Agreement.
  - 4. It is noted that if this property is deemed no longer needed that the Division of Homeland Security and Emergency Services must be notified prior to the disposition of the property. If the property is sold the sale price must be documented and portion of those proceeds may need to be returned to the Division of Homeland Security and Emergency Services.
  - 5. A physical inventory of the equipment must be performed at a minimum of every year in accordance to the City of Niagara Falls Fixed Asset policy and recorded on file.
  - 6. Any loss or damage to any equipment will be reported immediately and a record maintained.
- E. Record of Time:
- 1. Some grants involve the documentation and record of time for reimbursement purposes. Specific documentation must be maintained as support for project related personal service expenditures as the DHSES Agreement is supported by federal funds. Depending on the nature or extent of personal service provided under the DHSES Agreement, the City of Niagara Falls will maintain semi-annual (or more frequent) personal service certifications and/or an after-the-fact personnel activity reporting system (or equivalent) which complies with all applicable laws, regulations and program guidance. When time needs to be recorded it will be done in the following manner:
    - a. Any contractor working for the City on a time accrual basis must have a contract on file prior to performing the work.
    - b. Once a contract is on file the contractor may work on a requested basis at the direction of the Superintendent of Police. Once the contractor has completed the duties assigned a record of time and any associated attendance sheets and/or paperwork will be submitted to the appropriate office within ten working days.

- c. When time is recorded for reimbursement for any employee whether it be back fill or training or grant administration, the time will be recorded on a spreadsheet of hours worked and tasks performed along with any required personal service certifications. This spreadsheet along with copies of overtime payment requests, who the employee backfilled for and why (documentation must also be provided for where the original employee was with proof of what they were completing), and sign in sheets will be submitted with payroll and approved by the Superintendent of Police.

F. Payment:

1. Prior to payment all items must be reconciled and received by the Superintendent of Police or Designee.
2. All invoices received will be dated and a copy placed in the appropriate grants folder.
3. The invoice will be compiled by the NFPD Accounts Payable designee, according to department procedure. Prior to forwarding to the City Controller per the auditing schedule for payment, a note will be attached requesting the Controller to cut the check for only the specific SHSP purchase based on the voucher or purchase order issued. (If grant and non-grant purchases are paid on one check to a vendor, copies of all invoices paid will be needed to reconcile the amount of the check.)
4. Upon City Council approval the City Controller will issue payment to the vendor.
5. Once processed all vouchers will be printed and supporting documentation will be attached. Supporting documentation shall include: purchase orders, signed equipment authorizations, copy of grant resolution, packing slips and any other pertinent information.
6. Once the check is cut and mailed to the vendor the check number will be documented with the City Controller as well as written on the copy of the purchase order or voucher placed in the grants file located in the NFPD. A request will be made for the Controller to forward the NFPD Grants Administrator a copy of the cancelled check to add to the supporting documentation.
7. This information will be used to do the required quarterly reporting and to verify all expenditures from said grant.

G. Other Departments/Municipalities Participation:

1. Any other Department or Municipality that is a part of or will benefit from any grant administered by the NFPD will adhere to all policies set forth in this policy including documentation for payments.

H. Fiscal Reporting:

1. Reports will be sent in the time frame required by the grant. If there will be a delay in report submission, contact will be made by the NFPD Grants Administrator and a date for proposed completion provided.
2. Homeland Security reports will be submitted on E-Grants system by the NFPD Grants Administrator.

I. Retention of Records:

1. Original records must be retained for six years following the submission of the final claim against the DHSES Agreement or the end of the Agreement Period, if later.
2. In cases where litigation, a claim, or an audit is ongoing, the records must be retained until formal completion of the action and resolution of issues or the end of the six year Period, whichever is later.
3. In the event of an audit, the NFPD Grants Administrator or a designated responsible party must be prepared to produce source documents that substantiate claimed expenditures. DHSES requires that all documentation materials be organized, readily accessible, and cross-referenced to the Fiscal Cost Reports previously submitted.