



NASSAU COUNTY
BOARD OF COUNTY COMMISSIONERS
96135 Nassau Place, Suite 1
Yulee, Florida 32097

Daniel B. Leeper
Aaron C. Bell
Pat Edwards
Thomas R. Ford
Justin M. Taylor

Dist. No. 1 Fernandina Beach
Dist. No. 2 Amelia Island
Dist. No. 3 Yulee
Dist. No. 4 Bryceville/Hilliard
Dist. No. 5 Callahan/West Yulee

JOHN A. CRAWFORD
Ex-Officio Clerk

MICHAEL S. MULLIN
County Attorney/County Manager

TACO E. POPE, AICP
Assistant County Manager

May 27, 2020

Ms. Rona Kay Cradit
Bureau Chief
Office of Criminal Justice Grants
Department of Law Enforcement
P.O. Box 1489
Tallahassee, Florida 32302-1489

Dear Ms. Cradit,

In compliance with State of Florida Rule 11D-9, F.A.C., the Nassau County Board of County Commissioners approves the distribution of \$44,988 of Federal Fiscal Year 2019 Edward Byrne Memorial JAG Program funds for the following projects within Nassau County.

<u>Subgrantee</u>	<u>Title of Project</u>	<u>Dollar Amount (Federal Funds)</u>
Nassau County	2019 Drug Eradication and Special Response Team	\$44,988

Sincerely,

Daniel B. Leeper, Chairman
Nassau County Board of County Commissioners

(904) 530-6010 or (866)-474-1446

An Affirmative Action / Equal Opportunity Employer



Lobbying, Debarment and Drug Free Workplace Certification

Upon completion, mail a copy of this form to:
Florida Department of Law Enforcement
Office of Criminal Justice Grants
P.O. Box 1489
Tallahassee, FL 32302-1489

Applicants should refer to the regulations cited below to determine the certification to which they are required to attest. Applicants should also review the instructions for certification included in the regulations before completing this form. Signature of this form provides for compliance with certification requirements under 28 CFR Part 69, "New Restrictions on Lobbying" and 28 CFR Part 67, "Government-wide Debarment and Suspensions (Non-procurement) and Government-wide Requirements for Drug Free Workplace (Grants)". The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Office of Criminal Justice Grants determines to award the covered transaction, grant, or cooperative agreement.

1. Lobbying

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 28 CFR Part 69, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 28 CFR Part 69, the applicant certifies that:

- (a) No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with the making of any federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal grant or cooperative agreement.
- (b) If any funds other than federal appropriated funds have been paid or will be paid to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this federal grant or cooperative agreement, the undersigned shall complete and submit [Standard Form LLL – "Disclosure of Lobbying Activities"](#), in accordance with its instructions.
- (c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all subrecipients shall certify and disclose accordingly.

2. Debarment, Suspension and Other Responsibility Matters

As required by Executive Order 12549, Debarment and Suspension, and implemented at 28 CFR Part 67 -

- (a) The applicant certifies that it and its principals:
 - (i) Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of federal benefits by a State or Federal court, or voluntarily excluded from covered transactions by any federal department or agency;
 - (ii) Have not within a three-year period preceding this application been convicted of or had a civil judgement rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - (iii) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (a)(ii) of this certification; and
 - (iv) Have not within a three-year period preceding this application had one or more public transactions (Federal, State or local) terminated for cause or default.
- (b) Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

3. Drug Free Workplace

As required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 67, Subpart F, as defined at 28 CFR Part 67 Sections 67.615 and 67.620 -

- (a) The applicant certifies that it will or will continue to provide a drug-free workplace by:
 - (i) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the subgrantee's workplace and specifying the actions that will



Lobbying, Debarment and Drug Free Workplace Certification

Upon completion, mail a copy of this form to:

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Tallahassee, FL 32302-1489

be taken against employees for violation of such prohibition;

- (ii) Establishing an on-going drug-free awareness program to inform employees about –
 - (1) The dangers of drug abuse in the workplace;
 - (2) The subgrantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
 - (iii) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (i);
 - (iv) Notifying the employee in the statement required by paragraph (i) that, as a condition of employment under the grant, the employee will –
 - (1) Abide by the terms of this statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of criminal drug statute occurring in the workplace no later than five (5) calendar days after the conviction.
 - (v) Notifying the agency, in writing, within ten (10) calendar days after receiving notice under subparagraph (iv)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice including position title to: Florida Department of Law Enforcement, Office of Criminal Justice Grants, P.O. Box 1489, Tallahassee, FL 32302-1489. Notice shall include the identification number(s) of each affected grant.
 - (vi) Taking one of the following actions within thirty (30) calendar days of receiving notice under subparagraph (iv)(2), with respect to any employee who is convicted –
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency.
 - (vii) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (i) through (vi).
- (b) The subgrantee may insert in the space provided below the site(s) for the performance or work done in connection with

As the duly authorized representative of the applicant, I hereby certify that applicant will comply with the following certifications:

- Certification Regarding Lobbying (required for applications over \$100,000)
- Certification Regarding Debarment, Suspension and Other Responsibility Matters (required for all applicants)
- Certification Regarding Drug-Free Workplace (required for state agency applications)

Subrecipient: Nassau County Board of Co Commissioners

Printed Name: Daniel B. Leeper

Signature: _____

Title: Chairman

Date: May 27, 2020

CERTIFICATION FORM

Compliance with the Equal Employment Opportunity Plan (EEOP) Requirements

Please read carefully the Instructions (see below) and then complete Section A or Section B or Section C, not all three. If recipient completes Section A or C and sub-grants a single award over \$500,000, in addition, please complete Section D.

Recipient's Name: Nassau County Board of County Commissioners	
Address: 96135 Nassau Place, Suite 6, Yulee, FL 32097-8635	
Is agency a; <input checked="" type="checkbox"/> Direct or <input type="checkbox"/> Sub recipient of OJP, OVW or COPS funding?	Law Enforcement Agency? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
DUNS Number: 829978514	Vendor Number (only if direct recipient)
Name and Title of Contact Person: Carol Gilchrist, Grants Specialist	
Telephone Number:	E-Mail Address:

Section A—Declaration Claiming Complete Exemption from the EEOP Requirement

Please check all the following boxes that apply.

- | | | |
|---|--|--|
| <input type="checkbox"/> Less than fifty employees. | <input type="checkbox"/> Indian Tribe | <input type="checkbox"/> Medical Institution. |
| <input type="checkbox"/> Nonprofit Organization | <input type="checkbox"/> Educational Institution | <input type="checkbox"/> Receiving a single award(s) less than \$25,000. |

I, _____ [responsible official], certify that _____ [recipient] is not required to prepare an EEOP for the reason(s) checked above, pursuant to 28 C.F.R § 42.302. I further certify that _____ [recipient] will comply with applicable federal civil rights laws that prohibit discrimination in employment and in the delivery of services.

If recipient sub-grants a single award over \$500,000, in addition, please complete Section D

Print or Type Name and Title

Signature

Date

Section B—Declaration Claiming Exemption from the EEOP Submission Requirement and Certifying That an EEOP Is on File for Review

If a recipient agency has fifty or more employees and is receiving a single award or, subaward, of \$25,000 or more, but less than \$500,000, then the recipient agency does not have to submit an EEOP to the OCR for review as long as it certifies the following (42 C.F.R. § 42.305):

I, **Daniel B. Leeper** _____ [responsible official], certify that **Nassau County Board of County Commissioners**

[recipient], which has fifty or more employees and is receiving a single award or subaward for \$25,000 or more, but less than \$500,000, has formulated an EEOP in accordance with 28 CFR pt. 42, subpt. E. I further certify that within the last twenty-four months, the proper authority has formulated and signed into effect the EEOP and, as required by applicable federal law, it is available for review by the public, employees, the appropriate state planning agency, and the Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice. The EEOP is on file at the following office:

Nassau County Human Resources Department 96135 Nassau Place, Suite 5, Yulee, FL 32097-8635

[organization],

[address].

Daniel B. Leeper, Chairman

Print or Type Name and Title

Signature

May 27, 2020

Date

Section C—Declaration Stating that an EEOP Short Form Has Been Submitted to the Office for Civil Rights for Review

If a recipient agency has fifty or more employees and is receiving a single award, or subaward, of \$500,000 or more, then the recipient agency must send an EEOP Short Form to the OCR for review.

I, _____ [responsible official], certify that _____

[recipient], which has fifty or more employees and is receiving a single award of \$500,000 or more, has formulated an EEOP in accordance with 28 CFR pt. 42, subpt. E, and sent it for review on _____ [date] to the Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice.

If recipient sub-grants a single award over \$500,000, in addition, please complete Section D

Print or Type Name and Title

Signature

Date



**Subaward Management
Capabilities and Compliance
Questionnaire (SMQ)**

Upon completion, send a copy of this form to:

Florida Department of Law Enforcement
Office of Criminal Justice Grants
Post Office Box 1489
Tallahassee, FL 32302-1489
criminaljustice@fdle.state.fl.us

Grant Program: JAG PREA NARIP NCHIP RSAT PSN
 Other:

Subrecipient: Nassau Co Board of Co Commis FEID: 59-1863042 DUNS: 829978514

OVERVIEW

In order to meet eligibility requirements, applicants must be able to document compliance with the following prior to receiving a subaward:

- 2 C.F.R Part 25 – *Universal Identifier and System for Award Management Requirements*
- 28 C.F.R Part 42 – *Nondiscrimination; Equal Employment Opportunity, Policies and Procedures*
- 2 C.F.R Part §200.318-326 – *Federal Procurement Standards*
- 2 C.F.R §200.300-309 – *Standards for Financial and Program Management*

INSTRUCTIONS

Applicants seeking federal financial assistance from the Florida Department of Law Enforcement (FDLE), Office of Criminal Justice Grants (OCJG) should complete this questionnaire and provide all applicable documents with the submission of their application. Failure to provide appropriate forms, certifications, policies, procedures, or other documentation for the proposed project may result in special conditions being placed on the subaward.

This form, along with other application forms, may be submitted to criminaljustice@fdle.state.fl.us if scanned at the highest resolution (at least 600 dpi).

Note: Each applicant only needs to submit one pre-award monitoring packet regardless of how many applications for funding are being submitted. Applicants should ensure all "project-specific" forms can be easily identified.

CONTACT INFORMATION

For questions regarding this pre-award monitoring packet, contact FDLE's Office of Criminal Justice Grants at (850) 617-1250 or criminaljustice@fdle.state.fl.us.

APPLICATION POINT-OF-CONTACT (POC)

Please provide a point-of-contact to coordinate any additional information requests FDLE's Office of Criminal Justice Grants may have during review of this packet and your application.

Name: Carol Gilchrist
Title: Grants Specialist
Agency: Nassau Co Board of Co Commissioners
Phone: 904-530-6020
Email: cgilchrist@nassaucountyfl.com

The following section consists of a series of questions to aid in determining compliance with federal regulations required to properly administer these funds. Please read all questions carefully as some questions may require coordination with other divisions/bureaus in your agency (i.e. finance, purchasing, human resources, etc.). Additionally, to avoid possible special conditions being placed on your subaward, please ensure all requested documentation is submitted with this questionnaire.

SECTION I: AUDIT INFORMATION

The SUBRECIPIENT has undergone the following types of audits:

- Single Audit Financial Statement Defense Contract Agency Audit
 Audit Programmatic Audit for:
 Other Audit:
 None of the above

The SUBRECIPIENT'S most recent audit was conducted:

- Within the past 12 months Within the past two years More than two years ago

Name of Auditing Agency/Firm: **Purvis Gray**

Most recent auditor's opinion: Unqualified/Unmodified Qualified/Modified Other

Number of Findings on **most recent audit only**: **2**

- Were material weaknesses noted in the audit? Yes No
 Were significant deficiencies noted in the audit? Yes No
 Has the subrecipient addressed all findings and provided a management response or implemented corrective action? Yes No N/A

SECTION II: NON-PROFIT ORGANIZATION

1. Is the applicant entity a non-profit organization (including a non-profit institution of higher education) as described in 26 U.S.C. 501(c)(3) AND exempt from taxation under 26 U.S.C. 501(a)? Yes No NA

If "No" or "N/A" skip to Section III: Accounting System; If "Yes", complete questions 2 and 3 below.

2. Does the applicant non-profit organization maintain offshore accounts for the purpose of avoiding paying the tax describe in 26 U.S.C. 511(a)? Yes No
3. With respect to the most recent year the applicant non-profit organization was required to file a tax return, does the applicant non-profit organization believe (or assert) that it satisfies the requirements of 26 C.F.R. 53.4958-6 relating to the reasonableness of compensation for certain individuals? Yes No

SECTION III: ACCOUNTING SYSTEM

Helpful Hint – answers to these questions may need to be obtained from your finance department.

1. Which of the following best describes the organization's accounting system:
 Manual Automatic Combination
2. Does the accounting system identify the receipt and expenditure of funds separately for each grant? Yes No
3. Does the accounting system record and track expenditures for each grant by budget categories in the approved budget? Yes No
4. Does the accounting system have the capability to record, track, and document cost share or match for each grant? Yes No
5. Is the organization documentation to support recorded match or cost share available if requested? Yes No
6. Does the accounting/financial system include budgetary controls to prevent incurring obligations in excess of total funds or budget category (i.e. personnel, travel, etc.)? Yes No
7. Is the financial management system capable of producing the following:
 a. Detailed Activity Ledger? Yes No

- b. Cash Control Register? Yes No
- c. Property Control Register? (equipment purchases) Yes No

SECTION IV: INTERNAL CONTROLS & SEPERATION OF DUTIES

Helpful Hint – answers to these questions may need to be obtained from your finance and/or purchasing department.

1. Are the duties of the person responsible for maintaining financial records separated from any cash-related functions? Yes No
2. Are personnel who perform disbursement functions prohibited from purchasing, receiving and inventorying items? Yes No
 If no, are these functions approved by a third party? Yes No N/A
3. Is the signing of disbursement checks limited to individuals:
- a. Who are authorized to make disbursements? Yes No
- b. Whose duties do not include:
- Posting and recording of accounts receivable? Yes No
 - Approving vouchers for payment? Yes No
4. Describe the financial process/accounting mechanism used by the applicant to track grant funds separately from general revenue, other federal projects, and/or multiple funding sources.

 Nassau County follows the State of FL Uniform Accounting System for FL Counties and each award is assigned a project code which separates it from other funding sources.
5. What measures are used to verify all cost elements on a reimbursement are allowable under an approved subaward agreement?

 Requisitions for purchases are made through the Sheriff's Office and requires 3 approval signatures. It is then forwarded to OMB where it is reviewed and an additional 3 signatures are required.
6. What internal control measures are used to safeguard sensitive information (i.e. personally identifiable information, law enforcement sensitive information, etc.) relating to activities, expenditures, documentation, etc.?

 The Sheriff's Office is responsible for redacting all sensitive information before the documents are received in OMB for approval.
7. Did financial staff verify that grant funds would not be used to supplant local funds that had already been appropriated for the grant project or activities? Yes No
8. How long is the agency required to retain grant files and records of grant purchases?
 Files are retained 5 years after the annual audit.

SECTION V: CIVIL RIGHTS

Helpful Hint – answers to these questions may need to be obtained from your human resource department.

1. Is the entity aware it must comply with federal civil rights regulations including certifications and plan requirements? Yes No
2. Please indicate if any of the following apply to the applicant organization:
- Indian Tribe Nonprofit Organization Educational Institution Medical Institution
- Does not apply to applicant organization

3. Does the entity have more than 50 employees?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4. Does the entity receive federal funding under the U.S. Department of Justice, including any funds passed through another entity, of \$25,000 or more, but less than \$500,000?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
5. Does the entity receive federal funding under the U.S. Department of Justice, including any funds passed through another entity, of \$500,000 or more?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
6. Does the organization notify employees <u>AND</u> program participants that it does not discriminate on the basis of race, color, national origin, religion, sex, disability or age?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
7. Does the applicant organization have a written policy or procedure instructing employees <u>AND</u> program participants how to file a complaint regarding discrimination?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
8. Has the applicant organization had any findings of discrimination issued by a State or Federal court in the past three years?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

SECTION VI: PROCUREMENT

Helpful Hint – answers to these questions may need to be obtained from your finance and/or purchasing department.

1. Does the organization maintain written procurement procedures which includes provisions for:		
a. Conflict of interest procedures or statements?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
b. Disciplinary action for conflict of interest violations?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
c. Avoiding acquisition of unnecessary or duplicative items?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
d. Entering into intergovernmental agreements for shared purpose goods/services?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
e. Only procuring or awarding contracts to responsible contractors?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
f. Prohibiting use of geographical preference?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
g. Non-competitive procurement (sole source)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Does the procurement system provide a mechanism to determine selection on a competitive basis?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3. Does the procurement system include provisions for checking the Excluded Parties List (sam.gov) prior to award?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

SECTION VII: INVENTORY

Helpful Hint – answers to these questions may need to be obtained from your finance and/or purchasing department.

1. Does the organization's property management system provide and maintain the following information:		
a. A description of the equipment?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
b. A property identification number?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
c. Source of the property, including award number if grant funded?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
d. Who the title vests with?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
e. Acquisition date?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
f. Federal share of property cost, if federally funded?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
g. Location and condition of property?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
h. Ultimate disposition information?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Is documentation regarding property management for grant funded items available?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the agency assure that grant funded property is maintained and insured in compliance with federal requirements? Yes No

SECTION VIII: SUBRECIPIENT MANAGEMENT AND MONITORING

1. Does the applicant entity have written policies, procedures, and/or guidance designed to ensure that any subawards made by the applicant entity under a federal award – (1) clearly document applicable federal requirements, (2) are appropriately monitoring by the applicant, and (3) comply with the requirements in 2 CFR 200 (see 2 CFR 200.331)? Yes No

2. Is this applicant entity aware of the difference between subawards under federal awards and procurement contracts under federal awards, including the different roles/responsibilities associated with each? Yes No

3. Does the applicant entity have written policies and procedures designed to prevent the applicant entity from issuing a contract under a federal award to any entity or individual that is suspended or debarred from such awards? Yes No

SECTION IX: HIGH RISK DESIGNATION

1. Is the applicant entity designated "high risk" by a federal grant making agency or other pass-through entity? Yes No

CERTIFICATION ON BEHALF OF THE APPLICANT ENTITY

On behalf of the applicant entity, I certify to the Florida Department of Law Enforcement that the information provided above is complete and correct to the best of my knowledge. I have the requisite authority and information to make this certification on behalf of the applicant entity.

Title: Daniel B. Leeper, Chairman Phone: 904-530-6010
Date: Signature: