



Subaward Management Questionnaire (SMQ)

Upon completion, email a copy of this form
to: criminaljustice@fdle.state.fl.us

Subrecipient Name: Nassau County Board of County Commissioners

FEID: 59-1863042

DUNS: 829978514

OVERVIEW

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

- 2 CFR Part 25 – Universal Identifier and System for Award Management Requirements
- 28 CFR Part 42 – Nondiscrimination; Equal Employment Opportunity, Policies and Procedures
- 2 CFR §200.300-309 – Standards for Financial and Program Management
- 2 CFR §200.313 – Equipment (Inventory)
- 2 CFR §200.318-326 – Federal Procurement Standards
- 2 CFR §200.332 – Requirements for Pass-through Entities
- 2 CFR §200.430 – Compensation (Personal Services)

INSTRUCTIONS

Subrecipient seeking federal financial assistance from the Florida Department of Law Enforcement (FDLE), Office of Criminal Justice Grants (OCJG) must complete and submit this questionnaire annually. This questionnaire consists of a series of questions to aid in determining an agency's ability to comply with the federal regulations required to properly administer grant 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.). Failure to provide a completed questionnaire will result in a withholding of funds condition being placed on pending subaward(s).

CONTACT INFORMATION

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

ORGANIZATION POINT-OF-CONTACT

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

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

***** FDLE USE ONLY *****

Score Total: 154 Monitoring Determination: ONSITE*

**Subject to change at the discretion of the Office of Criminal Justice Grants.*

Subaward Management Questionnaire (SMQ)

Section I: General Information

- | | |
|--|-----|
| 1. Is the applicant entity designated high risk by a federal grant making agency or other pass through entity? | Yes |
| 2. Has the applicant entity received a prior subaward from the Office of Criminal Justice Grants? | Yes |
| 3. Has the applicant entity experience turnover in key staff positions in the past six months? Key staff positions include: Chief Official, Chief Financial Officer, Project Director, and/or Application Manager. | No |
| 4. Does the applicant entity retain all grant files and records of grant purchase for a minimum of five years after the closeout of the grant? | Yes |

Section II: Audit Information

- | | |
|---|------|
| 1. For which fiscal year was the subrecipient's most recent financial audit conducted? | 2020 |
| 2. During the audited fiscal year did the subrecipient expend \$750,000 or more in total federal funding? | Yes |
| a. If yes to #2, has the audit been uploaded to the Federal Audit Clearinghouse? | Yes |
| b. If no to #2, has a Certificate of Audit Exemption form been provided to OCJG? | N/A |
| 3. Did the auditor express <u>qualified/modified</u> opinion in the most recent audit report? | No |
| 4. Did the most recent audit note any material weaknesses and/or significant deficiencies? | No |

Section III: Equal Employment Opportunity (EEO)

- | | |
|---|-----|
| 1. Is the subrecipient, and implementing agency (if not covered by subrecipient's EEO documentation), aware they must comply with federal civil rights regulations, including certifications and plan requirements? | Yes |
| 2. Does the subrecipient organization have more than 50 employees? | Yes |
| 3. Does the subrecipient organization receive federal funding from the US Department of Justice (or pass-through entity) totaling \$25,000 or more? | Yes |
| 4. Has the subrecipient organization had any findings of discrimination issued by a state or federal court in the past three years? If yes, documentation of the finding must be included. | No |

Subaward Management Questionnaire (SMQ)

Section IV: Tiered Subrecipient Management and Monitoring

- | | |
|---|-----|
| 1. Is the subrecipient aware of the difference between subawards under a federal award and procurement contracts under federal awards, including the different roles/responsibilities associated with each? | Yes |
| 2. Does the subrecipient have written policies, procedures, and/or guidance designed to ensure that any tiered subawards made by the subrecipient under a federal award – (1) clearly documents applicable federal requirements; (2) are appropriately monitored by the subrecipient; and (3) ensure compliance with the requirements of 2 CFR 200.332? | Yes |
| 3. Does the subrecipient have written policies and procedures designed to prevent issuing a tiered subaward under a federal award to any entity or individual that is suspended or debarred from such funding? | Yes |

Section V: Accounting System

- | | |
|--|-----|
| 1. Does the subrecipient's accounting system identify the receipt and expenditure of funds separately for each grant (i.e. no commingling of funds)? 200.302(b)(1) | Yes |
| 2. Does the subrecipient's accounting system record and track expenditures for each grant <u>by budget categories</u> in the approved budget? 200.302(b)(5) | Yes |
| 3. Does the subrecipient's accounting system have the ability to record, track, and document cost share or match for each grant? 200.306(b)(1) | Yes |
| 4. Does the subrecipient's accounting system capable of producing the detailed ledgers and registers? 200.302(b)(3) | Yes |
| 5. Does the subrecipient's accounting system include budgetary controls to prevent incurring obligations in excess of total funds? 200.308(b) | No |

Section VI: Internal Controls

- | | |
|---|-----|
| 1. Are the duties of the person responsible for maintaining financial records separated from any cash related functions? | Yes |
| 2. Are personnel who perform disbursement functions prohibited from purchasing, receiving, and inventorying items? | Yes |
| 3. Is the signing of disbursement checks limited to authorized individuals whose duties do not include posting and recording of accounts receivable and approving vouchers for payment? | Yes |

Subaward Management Questionnaire (SMQ)

4. Does the applicant entity have procedures in place to safeguard personally identifiable information (PII) and law enforcement sensitive data? Yes
5. Does the applicant entity have procedures in place to ensure grant funds will not be used to supplant local funds that have already been appropriated for the proposed activities? Yes

Section VII: Inventory (Equipment Recipient)

1. Does the organization receiving the equipment have written procedures governing their inventory process? 200.313(d) Yes
2. Does the organization's property management system provide and maintain the following information: 200.308(d)(1)
- | | | |
|---|---|-----------------------------|
| a. Description of the equipment; | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. 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; and | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| h. Ultimate disposition information. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
3. Does the organization assure that grant funded property is maintained and insured in compliance with federal requirements? 200.313(d)(3) Yes

Section VIII: Procurement (Purchasing)

Subrecipients of federal funding are permitted to use the purchasing entity's own written procurement/purchasing procedures provided they are more stringent or consistent with the federal guidelines outlined in 2 CFR 200.318-326. The items below allow the purchasing organization to self-certify its procurement system in accordance with 2 CFR 200.324(c)(2). If answering "Yes", a page number must be provided.

1. Does the procurement policy contain a conflict of interest procedure/statement? 200.318(c) Page: 9 Yes
2. Does the conflict of interest procedure/statement include disciplinary actions for violations? 200.318(c) Page: 10 Yes
3. Does the procurement policy have provisions for avoiding purchase of unnecessary or duplicative items? 200.318(d) Page: 5 Yes
4. Does the procurement policy permit the use of intergovernmental agreements (i.e. state contract, etc.)? 200.318(e) Page: 4 Yes

Subaward Management Questionnaire (SMQ)

5. Does the procurement policy include requirements to verify contractors/vendors are neither suspended nor debarred in SAM.gov? 200.318(h) Page: 4 Yes
6. Does the procurement policy prohibit geographical preference? 200.319(b) Page: 5 Yes
7. Does the procurement policy have a threshold for purchases that do not require quotes (micropurchases) that is less than or equal to an aggregate purchase of \$10,000? 200.320(a) Page: 5 Yes
8. Does the procurement policy require informal competition (i.e. quotes) when purchases exceed \$10,000? 200.320(b) Page: 6 Yes
9. Does the procurement policy require formal competition (i.e. sealed bids, competitive proposals, etc.) when purchases meet or exceed \$250,000? 200.320(c-d) Page: 6 Yes
10. Does the procurement policy allow noncompetitive procurements (sole source) under only the following three circumstances: item(s) only available from a single source; public emergency; and/or after solicitation, competition is deemed inadequate? 200.320(f) Page: 6 Yes

Section IX: Certification

On behalf of the subrecipient, 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 subrecipient.

Signature: _____ Date: _____ *

Name: Thomas Ford Title: Chairman

**This form is valid for one year from the signature date and does not need to be resubmitted during a grant period.*