



Office of Criminal Justice Grants SUBAWARD MANAGEMENT QUESTIONNAIRE (SMQ)

Email completed form to: criminaljustice@fdle.state.fl.us

Eligible Recipient Name:

FEID:

UEI:

OVERVIEW

Recipients of federal financial assistance must be able to document compliance with the following sections of the Code of Federal Regulations (CFR) prior to receiving an award:

- 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 §200.331 – Requirements for Pass-through Entities
- 2 CFR §200.430 – Compensation (Personal Services)

INSTRUCTIONS

This questionnaire is required for all recipients seeking federal financial assistance from the Florida Department of Law Enforcement (FDLE), Office of Criminal Justice Grants (OCJG). The answers on this questionnaire will be reviewed by OCJG to evaluate the recipient's ability to comply with the federal regulations listed above. This questionnaire must be completed and provided to OCJG annually with each application. Failure to provide a completed questionnaire at the time of application will result in a withholding of funds condition being placed on your pending award.

Please read all questions carefully as they may require coordination with other divisions/bureaus in your agency (i.e. finance, purchasing, human resources, etc.).

CONTACT INFORMATION

For questions or assistance, 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:

Title:

Agency:

Phone:

Email:

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

Score Total:

Monitoring Determination:

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

SUBAWARD MANAGEMENT QUESTIONNAIRE (SMQ)

Section I: General Information

1. Has the eligible recipient been designated high-risk within the past three years by a federal entity or pass-through agency, including FDLE?
 - a. If "Yes", which entity designated your organization as high-risk?

 - b. Indicate the reason(s) for the high-risk designation below.

2. Has the eligible recipient received an award from the Office of Criminal Justice Grants within the past three years?
3. Has the eligible recipient experienced turnover in key staff positions in the past six months? Key staff positions include: Chief Official, Chief Financial Officer, and/or Recipient Grant Manager.
4. Does the eligible recipient retain all award files and records of award purchases for a minimum of five years after award closeout?
5. Does the eligible recipient utilize the E-Verify system to confirm a new employee's employment eligibility as required by Section 448.095(2), Florida Statutes?

Section II: Audit Information

You may wish to consult with your agency's Finance department to complete this section.

1. Enter the fiscal year of the eligible recipient's most recently completed financial audit.
2. Review the Schedule of Findings within the audit for the fiscal year named above. Did the auditor:
 - a. Express a qualified or modified opinion?
 - b. Note any material weaknesses and/or significant deficiencies?
 - *If the auditor noted findings that affect state or federal awards, a management response must be provided to OCJG. Failure to do so will result in a Withholding of Funds condition on your award.*
3. During the fiscal year named above, did the eligible recipient organization expend \$750,000 or more in total federal funding?
 - a. If Yes: Has the audit been uploaded to the Federal Audit Clearinghouse?
 - b. If No: Has a Single Audit Certification form been provided to OCJG?
 - *Answering "No" or "N/A" to both a and b will result in a Withholding of Funds condition on your award.*

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Section III: Equal Employment Opportunity (EEO)

You may wish to consult with your agency's Human Resources department to complete this section.

1. Is the eligible recipient aware they must comply with federal civil rights regulations, including certifications and plan requirements?
2. Does the eligible recipient organization have 50 employees or more?
3. Select largest single award amount of federal funding the eligible recipient received during the past fiscal year from the US Department of Justice (or pass-through entity).
4. Has the eligible recipient organization had any findings of discrimination issued by a state or federal court in the past three years?
 - *If yes, a copy of the findings must be provided to OCJG. Failure to do so will result in a Withholding of Funds condition on your award.*

Section IV: Tiered Contractor/Subrecipient Management and Monitoring

You may wish to consult with your agency's Purchasing or Finance department to complete this section.

1. Does the eligible recipient have written policies, procedures, and/or guidance designed to ensure that any tiered subawards made 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 200.331?
2. Is the eligible recipient aware of the difference between subawards and procurement contracts under federal awards, including the different roles/responsibilities associated with each?
3. Does the eligible recipient 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?
4. Do all third-party agreements with any tiered contractor or subrecipient (at any tier) require the contractor/recipients to register with and use the E-Verify system to verify the work authorization status of all new employees of the tiered contractor or subrecipient (at any tier) in accordance with Section 448.095(5), Florida Statutes?

Section V: Accounting System

You may wish to consult with your agency's Finance department to complete this section.

Does the eligible recipient's accounting system:

1. Identify the receipt and expenditure of funds separately for each grant (i.e. no commingling of funds)? [200.302\(b\)\(1\)](#)
2. Record and track expenditures for each grant by budget categories in the approved budget? [200.302\(b\)\(5\)](#)
3. Record, track, and document cost share or match for each grant? [200.306\(b\)\(1\)](#)
4. Produce detailed ledgers and registers? [200.302\(b\)\(3\)](#)
5. Include budgetary controls to prevent incurring obligations in excess of total funds? [200.308\(b\)](#)

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Section VI: Internal Controls

You may wish to consult with your agency's Finance department to complete this section.

1. Are the duties of the person responsible for maintaining financial records separated from any cash related functions? [2 CFR 200.303\(a\)](#)
2. Are personnel who perform disbursement functions prohibited from purchasing, receiving, and inventorying items? [2 CFR 200.303\(a\)](#)
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? [2 CFR 200.303\(a\)](#)
4. Does the applicant entity have procedures in place to safeguard personally identifiable information (PII) and law enforcement sensitive data? [2 CFR 200.303\(e\)](#)
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? [Section 2.3 of the DOJ Grants Financial Guide](#)

Section VII: Inventory (Equipment Recipient)

You may wish to consult with your agency's Purchasing or Finance department to complete this section.

NOTE: If the eligible recipient plans to purchase equipment on behalf of a separate governmental entity, documentation of the equipment transfer must be submitted to OCJG within 30 days of completion.

1. Does the eligible recipient's organization have written procedures governing their inventory process? [200.313\(d\)](#)
2. Indicate whether the eligible recipient's property management system provides and maintains the following information: [200.308\(d\)\(1\)](#)

	<u>Yes</u>	<u>No</u>
a. Description of the equipment;		
b. Property identification number;		
c. Source of the property (including award number if grant funded);		
d. Who the title vests with;		
e. Acquisition date;		
f. Federal share of property cost (if federally funded);		
g. Location and condition of property; and		
h. Ultimate disposition information.		
3. Does the eligible recipient assure that all grant funded property is maintained and insured in compliance with federal requirements? [200.313\(d\)\(3\)](#)

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Section VIII: Procurement (Purchasing)

You may wish to consult with your agency's Purchasing or Finance department to complete this section.

Recipients of federal funding are permitted to use their own written procurement/purchasing procedures provided they are more stringent or consistent with the federal guidelines outlined in 2 CFR 200.318-326. The questions below allow the eligible recipient 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 eligible recipient have a written procurement policy?
 - *If no, all award procurement must comply with the Management and Budget (OMB) Uniform Requirements outlined in 2 C.F.R. 200.318-326. Documentation of compliance with these requirements must be provided to OCJG at monitoring.*
2. Does the procurement policy contain a conflict of interest procedure/statement? [200.318\(c\)](#) Page:
3. Does the conflict of interest procedure/statement include disciplinary actions for violations? [200.318\(c\)](#) Page:
4. Does the procurement policy have provisions for avoiding purchase of unnecessary or duplicative items? [200.318\(d\)](#) Page:
5. Does the procurement policy permit the use of intergovernmental agreements (i.e. state contract, etc.)? [200.318\(e\)](#) Page:
6. Does the procurement policy include requirements to verify contractors/vendors are neither suspended nor debarred in SAM.gov? [200.318\(h\)](#) Page:
7. Does the procurement policy prohibit geographical preference? [200.319\(b\)](#) Page:
8. 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:
9. Does the procurement policy require informal competition (i.e. quotes) when an aggregate purchase exceeds \$10,000? [200.320\(b\)](#) Page:
10. 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:
11. 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:

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APPROVED AS TO FORM
By: Cody J. Ward
Office of the County Attorney

Section IX: Certification and Signature

On behalf of the eligible recipient, 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 eligible recipient.

Signature:

Title:

Print Name:

Date:

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

Supporting Documentation

Additional supporting documentation may be required as indicated below. This documentation must be provided to OCJG at the time of application, along with the completed SMQ, in order to prevent a withholding of funds condition on the award. If you have any questions, please contact OCJG at (850) 410-1250.

Single Audit

Management Response Letter

Single Audit Certification

Civil Rights

Adverse Discrimination Findings from a federal/state court or administrative agency



THE FOLLOWING SECTION IS FOR FDLE USE ONLY

Section X: FDLE OCJG SMQ Review

This form was reviewed by the following OCJG members:

Grant Specialist B:

Date:

Grant Specialist C:

Date:

COMMENTS: