



Policy for Grant-Funded Equipment & Supplies

East-West Gateway Council of Governments (the Council) has issued this Policy for Grant-Funded Equipment & Supplies (Policy) that governs equipment and supplies that are purchased with state or federal grant funds. The Policy applies equally to the grant-funded equipment and supplies an entity receives by any of the following means:

1. Grant-funded equipment and supplies that are purchased by the Council and transferred to an entity either through a financial assistance sub-award agreement, memorandum of understanding, or other agreement,
2. Grant-funded equipment and supplies that are purchased by the entity with grant funds provided by the Council through a financial assistance sub-award agreement, memorandum of understanding, or other agreement, or
3. Grant-funded equipment and supplies that are transferred to the entity by another agency, city, county, district, hospital or other organization.

The requirements described in this Policy may be updated periodically. Questions about this Policy should be directed to:

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1. **Definitions.** The terms and acronyms described in this Policy have the meanings provided below.
 - a) **CFR** means the Code of Federal Regulations.
 - b) **DHS** means the U.S. Department of Homeland Security.
 - c) **DHHS** means the U.S. Department of Health and Human Services.
 - d) **Disposition** means transferring ownership of any GFES to a different entity, selling GFES to a different entity or person, recycling, throwing-away, or using another method of discarding the GFES, or using other disposal methods whereby the entity is no longer the owner of the GFES; except that, moving the GFES from one location to another while retaining ownership of the item does not constitute a Disposition.
 - e) **Emergency** means a potential or actual mass casualty incident, man-made or natural disaster, or criminal terrorist incident.
 - f) **Equipment** means tangible personal property (including information technology systems) having a useful life of more than one (1) year and a per-unit acquisition cost that equals or exceeds one thousand dollars (\$1,000.00) that is purchased using grant funds and transferred to the receiving entity under the terms of a financial assistance sub-award agreement, memorandum of understanding, or other agreement.

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- g) **FEMA** means the Federal Emergency Management Agency.
 - h) **GFES** means any one or combination of Equipment or Supply(ies).
 - i) **HPP** means the Hospital Bioterrorism Preparedness Program.
 - j) **IRTF** means the Inventory Removal/Transfer form that an entity uses to request the disposition or transfer of GFES from its inventory.
 - k) **MoDHSS** means the Missouri Department of Health and Senior Services.
 - l) **MoOHS** means the Missouri Office of Homeland Security.
 - m) **Omni Circular** means the federal regulations found at 2 CFR Part 200 – *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.
 - n) **Policy** means this Policy for Grant-Funded Equipment & Supplies.
 - o) **Region C** means the Missouri HCC Region C that covers the following geographical area: city of St. Louis, Missouri and the Missouri counties of: Franklin, Jefferson, Lincoln, Pike, Perry, St. Charles, St. Francois, St. Genevieve, St. Louis, Warren, and Washington.
 - p) **Supply or Supplies** mean(s) any tangible personal property that does not meet the definition of Equipment that is/are purchased using grant funds and transferred to the entity under the terms of a financial assistance sub-award agreement, memorandum of understanding, or other agreement; however, any computing device that has a per-unit acquisition cost of less than one thousand dollars (\$1,000.00) is a supply regardless of the length of its useful life.
 - q) **Urban Area** means the St. Louis Urban Area that includes the bi-state, eight county St. Louis metropolitan area served by the Council that includes: city of St. Louis, Missouri and Franklin, Jefferson, St. Charles, and St. Louis counties in Missouri and Madison, Monroe, and St. Clair counties in Illinois.
2. **Applicable Period.** This Policy will be in effect until **the later occurrence** of: (a) five (5) years after the date on which the entity takes possession of the Equipment or Supply(ies); or (b) until the fair market value of the item is zero (0).
3. **Use.** An entity's use of the GFES is limited to the circumstances described in Section 3, Parts (a) – (d).
- a) An entity must use the GFES for the program or project for which the Council or the entity purchased the GFES as long as the GFES are needed for that program or project and regardless of whether or not the project or program continues to be supported by the federal government.
 - b) During the time that the GFES are used for the project or program for which it was acquired, the entity must also make the GFES available for use on other projects or programs currently or previously supported by the federal government provided that this use will not interfere with the work on the project or program for which they were



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- originally acquired. First preference for other use must be given to other projects or programs supported by MoOHS or MoDHSS, as applicable, and second preference must be given to other federally supported projects or programs.
- c) The entity must also make deployable GFES available to respond to an Emergency. During an Emergency, the Council, MoOHS, the Missouri State Emergency Management Agency, DHS, FEMA, MoDHSS, DHHS, or an emergency response agency in the Urban Area or Region C, as applicable, may request that the entity provide the deployable GFES to respond to the Emergency. If the entity receives this type of request, the entity shall cooperate with the requesting entity to fulfill the request and shall either convey any deployable GFES to the agreed upon staging location or otherwise make the deployable GFES available for use during the Emergency. Nothing in this Section 3, Part (c), will be deemed to require the entity to provide any non-deployable GFES or to provide the deployable GFES to a requesting entity if the entity is using the deployable GFES to respond to an Emergency in the Urban Area or Region C, as applicable. This Section 3, Part (c) will not be deemed to supersede an existing mutual aid or similar agreement that the entity has in place with other entities for Emergency response.
 - d) In accordance with the Omni Circular § 200.313, the entity may also use the GFES to support non-Federally supported projects or programs and may consider user fees, as appropriate.
4. Care. The entity must take reasonable care of the GFES and take active steps to protect it from loss, theft, damage, or destruction. The entity must also take reasonable steps to identify and dispose of any expired Supplies. In the event of the loss, theft, damage, or destruction of any Equipment or the expiration of any Supplies, the entity must follow the steps described in Section 5 to document the loss, theft, damage, or destruction of any GFES or the steps described in Section 14 to dispose of any expired Supplies. The entity is fully responsible to repair or replace any GFES that is lost, stolen, damaged, or destroyed due to the willful or negligent acts of the entity and any repaired or replacement Equipment or Supplies will be governed by this Policy to the same extent that the original GFES were governed.
5. Loss, Theft, Damage, or Destruction. In the event that any GFES is lost, stolen, damaged, or destroyed, the entity must:
- a) within ten (10) calendar days of the incident, notify the Council's point of contact designated in Section 15, Part (a) about the loss, theft, damage, or destruction,
 - b) promptly and properly investigate and fully document the loss, theft, damage, or destruction,
 - c) provide a copy of the investigative report and other documentation to the Council's point of contact designated in Section 15, Part (a),
 - d) retain a copy of the investigative report and other documentation in the entity's project records,
 - e) if the GFES was lost, stolen, damaged, or destroyed due to the willful or negligent acts of the entity, take steps to replace or repair the GFES, and



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- f) within fourteen (14) calendar days of completing its investigation, complete, sign, and submit an IRTF to the Council's point of contact designated in Section 15, Part (a).
- 6. **Maintenance.** The entity must maintain all GFES in accordance with the manufacturer's guidance, the entity's standard operating procedures and guidelines, and accepted practices. At a minimum, the entity must maintain the GFES so that each are in mission-ready condition. The entity is responsible for the costs associated with maintaining any GFES and the cost of routine upkeep for Equipment (e.g. gasoline, tire replacement, oil changes, inspections) are not costs that are eligible for reimbursement from any of the Council's grant programs. Upon the Council's request, the entity must submit maintenance logs for any Equipment that requires regular maintenance (e.g. vehicles, trailers, generators).
- 8. **Training.** The entity is responsible for providing training to its personnel, as needed, in the proper and safe use of any GFES.
- 9. **Inventory & Reports.** The entity is responsible for maintaining an up-to-date inventory of and preparing/submitting reports for all GFES.
 - a) **Inventory.**
 - i) **Inventory Management System.** The entity must establish and utilize a proper inventory management system that allows the entity to track and account for any GFES. If the entity has an existing inventory management system, then the entity may continue to use that system provided that the system allows the entity to capture and track each of the items of information described in the MoOHS Administrative Guide for Homeland Security Grants, section "Inventory," as it may be updated from time-to-time. A current edition of the Administrative Guide can be found online at: <https://dps.mo.gov/dir/programs/ohs/grantstraining/>.
 - ii) **Inventory Tags.** As part of its inventory practice, the entity must tag each piece of Equipment. The entity may choose the method and type of tagging (e.g. barcode tags, numbered labels) provided that the tag includes a number that can be used to identify and locate the Equipment. The entity must include these tag numbers on the ICF that is submitted to the Council when it receives the Equipment or in its inventory reports.
 - iii) **Equipment Decals.** The Council will provide the entity with funding-source decals that must be attached to any vehicles, trailers, generators, or other mobile assets that are identified by the Council. The entity is responsible for ensuring that the decals are affixed to these types of Equipment and in a location that is easily visible by members of the public and during any on-site inventory.
 - iv) **On-site Inventories.** The Council may elect to conduct on-site inventories of the GFES. The Council, to the extent possible and practicable, will notify the entity of the Council's intent to conduct an on-site inventory and will work with the entity to schedule a mutually convenient time and date for an on-site inventory.

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The entity must cooperate with the Council in the Council's effort to conduct an on-site inventory and must make its personnel and facilities available to the Council to conduct an on-site inventory.

b) **Reports.**

- i) **Inventory Reports.** If the entity received or purchased Equipment, the entity must update and return to the Council an inventory report in the form and format specified by the Council. The entity must submit its inventory report no later than October 15th of each year during the period described in Section 2. As part of its inventory reporting, the entity is responsible for calculating and tracking the depreciation of the fair market value of each item of Equipment and will report this depreciation on the entity's inventory reports. The method that the entity uses to calculate the depreciation of the Equipment must be consistent with the method the entity uses to calculate depreciation for the equipment that the entity purchases. With respect to any Equipment that was disposed of during the reporting period, the entity must adhere to Section 14 with respect to reporting on the disposed of items. The inventory report must be submitted to the Council's point of contact designated in Section 15, Part (a). The entity's failure to adhere to this reporting requirement may cause the entity to be deemed ineligible to receive GFES or grant funds in the future.
- ii) **Vehicle Mileage Logs.** If the entity's GFES includes a vehicle, then the entity must also maintain and submit vehicle mileage logs in the form and format specified by the Council. The entity submit its vehicle mileage logs no later than October 15th of each year during the period described in Section 2. At a minimum, the vehicle mileage log must capture the information described in the MoOHS Administrative Guide for Homeland Security Grants, "Vehicles, Usage Log" section, as it may be updated from time-to-time. A current edition of the Administrative Guide can be found online at: <https://dps.mo.gov/dir/programs/ohs/grantstraining/>. The vehicle mileage logs must be submitted to the Council's point of contact designated in Section 15, Part (a). The entity's failure to adhere to this reporting requirement may cause the entity to be deemed ineligible to receive GFES or grant funds in the future.

10. **Insurance.** In accordance with the requirements described in its agreement with the Council, the entity must carry property and casualty insurance coverage to protect any Equipment and this insurance must be of the same character and amount that the entity carries to protect any of its own property (e.g. equipment, vehicles). The entity must obtain this insurance from a company authorized to issue insurance in Missouri (for entities formed under Missouri law) or Illinois (for entities formed under Illinois law) or must provide the insurance coverage through a self-insurance program. The entity must submit proof of insurance coverage, upon the Council's written request, but, at a minimum, no later than sixty (60) calendar days after the entity receives the Equipment and, thereafter, no later than October 15th of each year during the period described in Section 2. If the entity is relying on a self-insurance program to provide the insurance coverage, then the entity's proof of insurance must be demonstrated through a



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- signed, written statement to the Council regarding the self-insurance program and certifying that the program meets the insurance requirements. The entity must submit this proof of insurance to the Council's point of contact designated in Section 15, Part (a). The entity must also, upon written request, provide the Council written copies of its insurance policies.
11. Title and Registration. The entity must ensure that any vehicle, trailer, or similar Equipment is properly titled and registered with the appropriate state agency and in accordance with the state's requirements. The entity must submit proof of title and registration no later than thirty (30) calendar days after titling and registering any vehicle, trailer, or similar Equipment. The entity must submit this proof to the Council's point of contact designated in Section 15, Part (a).
 12. Location. The entity must notify the Council of the storage location the entity has selected for the GFES and must notify the Council in writing about any permanent changes to the GFES's storage location within fourteen (14) calendar days of the location change. The notices required by this Section 12 must be submitted to the Council's points of contact designated in Section 15, Parts (a) and (b). The entity may select the storage location for the GFES; however, the storage location must, at a minimum, be:
 - a) accessible to the entity or the entity's designee twenty-four (24) hours a day, seven (7) days a week,
 - b) secure enough to protect the GFES from loss or theft, and
 - c) within the Urban Area or Region C, as applicable, unless the Council has provided its express written authorization for the GFES to be stored outside the Urban Area or Region C, as applicable.
 13. Entity's Points of Contact. The entity must notify the Council's points of contact designated in Section 15, Parts (a) and (b) of the entity's primary and secondary points of contact that the Council or other officials may use to contact the entity about the GFES. It is recommended that the entity designate a dispatch center as its primary point of contact. For both the primary and secondary points of contact, the entity must provide the person's (as applicable):
 - a) name;
 - b) title;
 - c) e-mail address;
 - d) business mailing address; and
 - e) a phone number at which the point of contact can be reached twenty-four (24) hours a day / seven (7) days a week.
 14. Disposition and Obligation. If the entity determines that it wishes or needs to dispose of any GFES, then the entity must adhere to the procedures and requirements described in Section 14, Parts (a) and (b). The entity's obligation to the Council for a Disposition is described in Section 14, Part (b). The entity's failure to adhere to the requirements described in Section 14, Parts (a) and (b) may cause the entity to be deemed ineligible to receive GFES or grant funds in the future.

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- a) **Disposition.** The entity is not permitted to undertake a Disposition without first obtaining the Council's prior written authorization. To obtain the Council's prior written authorization, the entity must complete, sign, and submit an IRTF to the Council's point of contact designated in Section 15, Part (a). The Council will determine if the GFES is eligible for Disposition, based upon the criteria described in Section 14, Part (a)(i), and will notify the entity in writing if, and to what extent, the Disposition is approved.
- i) GFES are eligible for Disposition if the item meets any one or combination of the following criteria:
1. Is no longer needed for the project or program for which it was originally acquired and it is not needed for any other DHS or DHSS project or program, as applicable.
 2. Is expired, defined as past the item's useful shelf life.
 3. Is obsolete, defined as no longer in use or no longer capable of being used due to changes in methods, procedures, or technology.
 4. Was consumed during training, an exercise, a deployment, Emergency response, or similar activities.
 5. The applicable period described in Section 2 has expired.
- b) **Obligation.** Once the entity obtains the Council's prior written authorization for a Disposition, the entity's obligations to the Council are as follows:
- i) For Equipment with a per item fair market value of less than \$5,000, the entity may dispose of the item without further obligation to the Council.
- ii) For Equipment with a per item fair market value of more than \$5,000, the entity may dispose of the item; however, the Council will have a right to the fair market value proceeds from the sale of the Equipment. The entity will return to the Council the fair market value proceeds from the sale of the Equipment and must cooperate with the Council's effort to obtain the fair market value proceeds from the sale. The Council will notify the entity about the deadline for returning the proceeds to the Council and the method and form that the entity must use to return the proceeds to the Council. The entity's failure to adhere to the requirements described in this Section 14, Part (b)(ii) may cause the entity to be deemed ineligible to receive GFES or grant funds in the future.
- iii) For Supplies, the entity may dispose of the item(s) without further obligation to the Council.
- iv) Upon the entity's Disposition conducted in accordance with Section 14, the Equipment that is disposed of will be removed from the entity's inventory and the entity will have no further obligation to track and report on disposed Equipment.



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15. The Council's Points of Contact. The Council points of contact are as follows:
- a) **Admin Point of Contact.** Leah Watkins, leah.watkins@ewgateway.org; (314) 421-4220.
 - b) **STARRS Point of Contact.** STARRS@ewgateway.org.