



MEMORANDUM

TO: Clackamas County Board of County Commissioners (BCC)
FROM: Gary Schmidt, County Administrator
RE: Documents signed on the Board's behalf during the July 2024 Recess
DATE: July 23, 2024

REQUEST: Informational update on documents signed by the County Administrator during the Board's July 2024 recess.

BACKGROUND: Per County Code, the County Administrator (or their designee) has the authority to sign on behalf of the Board of County Commissioners during recesses longer than 1 week to facilitate the business of the County when the Board is unable to convene. During the Board's recess, the following were signed by myself or Nancy Bush as Acting County Administrator during my absence:

- 1) Certifications related to the Community Development Block Grant application for Community Development Block Grant funds, HOME funds, and Emergency Solutions Grant funds. No fiscal impact. No County General Funds are involved.
- 2) Amendment #4 to a Contract with Antfarm for Rural Youth Sheltering and Inclement Weather Shelter Services. Amendment value is \$87,000 and 1 year, total contract value is increased to \$1,767,706.84 over 1 year and 7 months. Funding is through Oregon Housing & Community Services. No County General Funds are involved.
- 3) Approval to apply for a grant with the US Department of Justice – Office of Community Oriented Policing Services in the amount of \$265,000 for the purchase of a new use-of-force simulator for CCSO. No County General Funds are involved.

RECOMMENDATION: No action required; this is an informational update.

Attachments:

2024 CDBG, HOME, and ESG Certifications

Amendment #4 to Contract #11299 with Antfarm

CCSP Grant Application

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

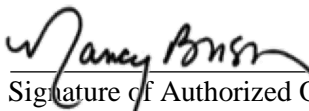
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, 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 awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid 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 this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official

7/3/24
Date

Chief Operating Officer
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

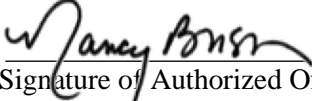
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

7/3/24

Date

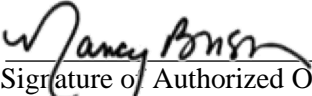
Chief Operating Officer

Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature of Authorized Official

7/3/24
Date

Chief Operating Officer
Title

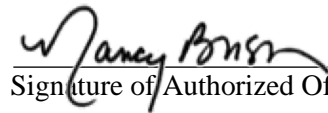
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official

7/3/24

Date

Chief Operating Officer

Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

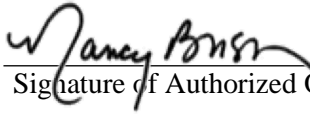
Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.



Signature of Authorized Official

7/3/24

Date

Chief Operating Officer

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**AMENDMENT # 4
TO THE CONTRACT DOCUMENTS WITH
Contract #11299**

This Amendment #4 is entered into between ANTFARM (“Contractor”) and Clackamas County (“County”) and shall become part of the Contract documents entered into between both parties on December 07, 2023 (“Contract”).

The Purpose of this Amendment #4 is to make the following changes to the Contract:

1. ARTICLE I, Section 2. **Scope of Work.** The Scope of Work language added in Section 1 of Amendment #1 to the Contract related to additional services for warming and cooling shelters is hereby deleted in its entirety and replaced with the following:

Contractor shall provide the following personal services: Provide overnight inclement weather centers during periods of extreme cold and smoke, inclement weather day centers during periods of extreme cold, warm, and smoke filled weather. Provide support services to households staying in non-congregate hotel/motel based emergency shelter (“Work”), further described below and in **Exhibit A to this Amendment #4**, attached hereto and incorporated by reference herein.

2. ARTICLE I, Section 3. **Consideration** is hereby amended as follows:

In consideration for Contractor providing the additional services described in this Amendment #4 for the period of July 1, 2024 through June 30, 2025, the County may pay Contractor, from available and authorized funds, a sum not to exceed **Eighty-Seven Thousand Dollars (\$87,000)**.

Consideration is on a per person, per day/night rate for overnight and day inclement weather center services in accordance with the budget below. All other consideration is on a reimbursement basis in accordance with the following budget:

Inclement Weather Activities Budget FY 25		
Overnight Inclement Weather Center	Per Night Rate: 10 or fewer guests = \$350 11 or more guests = \$35 per COUNTY confirmed individual	
Day Inclement Weather Center	Per Person Rate: \$35	\$ 49,000
Staffing Support		\$ 30,000
Administration	10% indirect	\$ 8,000
Inclement Weather Total:		\$ 87,000

Consideration for per person, per day or night bed rates for inclement weather services is further described below:

- a. Overnight Inclement Weather Center. Contractor will be paid a flat rate of \$350.00 for 10 or fewer guest, plus \$35 per additional guest, per authorized night of inclement weather services (as described in **Exhibit A to this Amendment #4** and as determined by County in its sole discretion), in an amount not to exceed a total combined amount with day inclement weather center of \$49,000. Payment is subject to County confirmation of the number of people served. Contractor may not exceed the maximum capacity permitted by local Fire and/or Health Department. In the event the County determines an inclement weather night has or will occur, County will pay Contractor for a minimum of four beds (\$140), regardless of whether they are used, for each night Contractor opens the overnight center. Should any inclement weather night occur when no beds are occupied, Contractor must notify the County within 12 hours.

If an overnight inclement weather center is open three nights (consecutive or non-consecutive) and no County confirmed guest uses the shelter, County may, at its sole discretion, terminate the additional overnight inclement weather center services authorized by this Amendment #4. Contractor may continue to operate inclement weather center services following such termination, but County shall have no further obligation to pay Contractor for such services.

- b. Day Inclement Weather Center. Contractor will be paid at a rate of \$35.00 per person, per authorized day of inclement weather services (as described in **Exhibit A to this Amendment #4** and as is determined by County in its sole discretion), in an amount not to exceed a total combined amount with overnight inclement weather center of \$49,000. Payment is subject to County confirmation of the number of people served. Contractor may not exceed the maximum capacity permitted by local Fire and/or Health Department. Day inclement weather centers will be based on the County confirmed number of individuals in the center the previous night.

ORIGINAL CONTRACT	\$ 760,446.72
AMENDMENT #1	\$ 87,000.00
AMENDMENT #2	\$ 783,260.12
AMENDMENT #3	\$ 50,000.00
AMENDMENT #4	\$ 87,000.00
TOTAL AMENDED CONTRACT	\$ 1,767,706.84

3. **Compliance with Grant.** Funding for the inclement weather center services is provided, in part, by funds received under a grant agreement between Clackamas County and the State of Oregon, Grant No. 8018 (“Grant”), a copy of which has previously been provided to Contractor. In performing the Work authorized by this Amendment #4, Contractor shall comply with all terms and conditions of the Grant, including all exhibits thereto, including, but not limited to, the additional terms and conditions set forth in **Exhibit C to the Amendment #4**, attached hereto and incorporated by this reference herein. Contractor shall further require any approved subcontractor to comply with the terms and conditions of the Grant, including all exhibits thereto. Contractor agrees to take necessary steps, and execute and deliver any and all necessary instruments, to perform under this Contract including, but not limited to, executing all additional documentation necessary to comply with County’s funding requirements, including the Grant.

By their signatures below, the parties to this Contract agree to the terms, conditions, and content expressed herein.

ANTFARM

L Jones Singing

7/03/2024

Authorized Signature

Date

Clackamas County

Nancy Bush

7/3/2024

Signature

Date

Name / Title (Printed)

Name

County Operation Officer

Title

Approved as to Form:

Amanda Kelly

7/3/2024

County Counsel

Date

EXHIBIT A
SCOPE OF WORK

Inclement Weather Shelter Services Program Design

Contractor will provide inclement weather services (“Inclement Weather Work”) to County on an on-call or as-needed basis. Consideration for Inclement Weather Work is on a per-bed, per day or night rate at the rates set forth in Article I, Section 3 Consideration of Amendment #4 above.

When County requires Contractor to perform Inclement Weather Work, it will notify Contractor that such services will be required. County expects it will require Contractor to perform Inclement Weather Work for warming shelters, cooling shelters, or smoke shelters but County may, in its sole discretion, require Inclement Weather Work for other purposes. Inclement Weather Work for warming shelters, cooling shelters, or smoke shelters will generally be required as follows:

a. Warming Shelter

County will require Contractor to open warming shelters on days or nights when the actual temperature or wind chill temperature is predicted by the National Weather Service to be 33 degrees Fahrenheit or below, including wind chill factor. Warming shelters must be activated during the first night of this alert. As it is impossible to predict all severe weather scenarios, warming shelters may also be activated when weather conditions do not meet the criteria above, but County determines if operation of a warming shelter is in the County’s best interest. Examples of when a warming shelter may be activated outside of temperature reasons include, but are not limited to, predicted high winds, flood watches, flood warnings, or extremely heavy rain.

b. Cooling Shelter

County will require Contractor to open cooling shelters on all nights when the National Weather Service has declared that the region will be under a Heat Advisory, Watch, or Warning between the hours of 8pm and 8am. Cooling shelter may also be activated when weather conditions do not meet the criteria above, but County determines if operation of a warming shelter is in the County’s best interest. All cooling shelters *must* have air conditioning in each hotel/motel room.

c. Smoke Hotel / Motel Shelter

County will require Contractor to open shelters in the event of certain smoke or air quality events. These air quality events include whenever the Air Quality Index (AQI) reaches the “unhealthy” level due to fire or other emergency. This information can be found at airnow.gov. County will endeavor to provide as much prior notice of the need for Contractor to provide Inclement Weather Work as is reasonably practicable. However, the parties understand and agree that the County’s need for Inclement Weather Work is based on severe weather conditions and as such, prior notice may be limited.

Because the Inclement Weather Work is on an on-call or as-needed basis, and the exact amount of Inclement Weather Work, if any, is unknown, nothing in this Amendment #4 shall be construed as a promise to pay Contractor the full amount budgeted for Inclement Weather Work in Article I, Section 3 of this Amendment #4.

Nothing herein shall be construed as prohibiting Contractor, if permitted by applicable law, to provide emergency shelters that it chooses to operate on days or nights that are not approved by Clackamas County for extreme weather or smoke activation. However, unless authorized by County, Contractor will not receive reimbursement from the County for those days or nights.

In providing the Inclement Weather Work, Contractor shall comply with the following terms and conditions:

1. Contractor shall not charge fees to any guests.
2. Contractor shall provide all Center services in a trauma informed and wholly secular manner.
3. Contractor shall not categorically exclude persons fleeing domestic violence.
4. Contractor shall ensure a welcoming and safe environment for people of all genders, including persons who identify as transgender or non-binary.
5. Contractor shall not require guests to be clean and sober or pass urinalysis or breath testing. However, Contractor must impose rules disallowing alcohol or drug possession or use at the shelters.
6. Contractor must incorporate harm reduction into its Inclement Weather Work.
7. Contractor must impose rules to ensure a safe environment, but such rules must be in plain language and as streamlined as possible. Contractor's rules must be in accordance with applicable law.
8. Contractor shall comply with all relevant health, fire, and life safety codes.
9. Contractor shall have a written policies in place for:
 - Background Check policy
 - Records Retention policy
 - Fiscal policy that outlines separation of duties and fraud prevention and recovery (both employee and participant)
10. Contractor shall have a written harm reduction policy that addresses under what circumstances and for what conduct people may be excluded from Contractor's shelters, and for what period of time. In the event a person is excluded under the harm reduction policy, Contractor must document the reason for the exclusion and the duration. Contractor must make a diligent effort to ensure that the excluded person has an alternate safe place to sleep.

If a guest has to leave due to disruption or of their own free will, Contractor will consult with County on whether bed night or day shelter rate is allowable. Regardless of the situation, no bed nights or day shelter will be reimbursable if the Contractor does not have complete and accurate HMIS data for the guest, further described below.

11. Contractor must perform criminal background checks and have specific screening criteria for all staff and volunteers who will be performing direct services under this Contract. Policies must be in place to disqualify any persons who have committed violent crimes, crimes against children, or other crimes that are incompatible with this Contract.
12. Contractor hereby authorizes County to include information on shelter availability, address, and volunteer needs in media releases and websites, including, but not limited to 211, the County website, and through social media, such as, but not limited to, Facebook and Next Door.
13. Contractor must obtain written approval to open and operate as an Extreme Weather or Smoke Center (including occupancy certification) from the local fire marshal and the jurisdiction with permitting authority. Contractor shall provide County with copies of the written approval. Contractor must perform the Inclement Weather Work in accordance with any applicable County or fire marshal requirements. Contractor may only operate shelters for the period of time permitted by the jurisdiction with permitting authority, including Fire District or fire marshal permit or requirements. Contractor is responsible to request/apply for any permits/extensions by the authority having jurisdiction.
14. Shelter requirements generally. Contractor must provide a minimum of two staff or volunteers during all hours of operation. If more than 30 guests are on site, from the hours of 6pm to 10pm, additional volunteers or staff are strongly recommended to provide safety for all guests, staff and volunteers. From the hours of 10pm to 7 am volunteers or staff will provide fire watch and safety check requirements. Contractor shall require staff and volunteers to document shift times to show minimum requirements are met on sign-in sheets.

15. Warming Center requirements:

- a. Night Warming shelters must open by 6pm and stay open through at least 7am. Hot beverages and sleeping mats or cots must be available to every guest, and warming center facilities must be heated and have restrooms available.
- b. Day Warming shelters must open by the time the overnight shelter closes and must remain open until at least 6pm. Hot beverages must be available to every guest, and day shelter facilities must be heated and have restrooms available. Day shelter will be paid based on the County confirmed number of individuals in the warming center the previous night. Day shelters will be opened on a schedule authorized by County.
- c. Contractor may look at predictions for opening day shelter from 8pm – 11pm on the previous night and has flexibility to also check predictions prior to 7am when day shelter is required to open. However, once the written notification of opening for day shelter has been sent out, Contractor must open for day shelter services, even if the weather prediction for day shelter changes and does not meet the wind chill threshold after the email announcement is sent.
- d. Centers shall send a single e-mail to County and 211 Info staff and other contacts below between 10:00am – 12pm the day of a Warming Center activation as notification that the warming center will be open that night and shall provide

notification through the same email method prior to 7am on the same day of day shelter services being activated.

16. Cooling Centers (congregate shelter)

Cooling Centers will open to the general public from Noon to 8pm on all days when the National Weather Service (NWS) has declared that any of the Regions below will be under a Heat Advisory, Watch, or Warning at: <https://www.weather.gov/portland>:

- Region: OR006 Portland Metro Area
- Region: OR007 Central Willamette Valley
- Region: OR010 North Oregon Cascade Foothills
- Region: OR011 North Oregon Cascades

- a. Contractor shall check the above website between 8am-10am.
- b. Contractor must announce opening by 10am through the County email distribution list and must directly notify local Fire and jurisdiction contacts as required by those authorities. The email shall be sent the same day as Cooling Center activation as notification that the Center will be open, and Contractor shall provide notification through the same email method prior to 8pm if overnight services are activated.
- d. If any of the Regions above are listed as being under an Excessive Heat Watch or Warning after 10am, after Contractor has already checked the conditions at the website above on the same day, Contractor will have the option of opening the site for reimbursement.
- e. Contractor shall check National Weather Service (NWS) website (<https://www.weather.gov/>) for Special Weather Statements and Advisories that may lead up to the issuance of an Excessive Heat Watch or Warning for the specific center location. The map and legend on the NWS website will show any alerts and the type of alert. If there is an Excess Heat Watch or Warning, Contractor can select the label in the map legend to determine if any of the 4 Regions (National Weather Service Public Forecast Zones) present in Clackamas County are affected: <https://www.weather.gov/wwamap/wwatxtget.php?cwa=pqr&wwa=all>.
- f. If the Excessive Heat Watch/Warning extends past 8 PM, County will provide an additional per person reimbursement for each guest who accesses overnight shelter. **Overnight hours: 8pm to 8am.**
- g. Cooling Centers may also be activated when weather conditions do not meet the criteria above after consultation and approval by either the Clackamas County Social Services Director or Program Manager.
- h. Cold beverages must be available to every guest, and facilities must be air conditioned and have restrooms available.

- i. Cooling Centers must provide a minimum of two staff or volunteers during all hours of operation. If more than 30 guests are on site, from the hours of 6pm to 10pm, additional volunteers or staff are strongly recommended to provide safety for all guests, staff and volunteers. If overnight is opened, the hours of 10pm to 7am volunteers or staff will provide fire watch and safety check requirements. Contractor shall require staff and volunteers to document shift times to show minimum requirement was met on Sign-in Sheets.
- j. Contractor will be paid on a per-person per day basis for days that a Cooling Center is open under the authorization of Clackamas County, in the amounts set forth in Article I, Section 3 of this Amendment #4, up to an amount not to exceed the total contracted budget for Inclement Weather Work. Occupancy cannot exceed the established occupancy guidelines for the site.

17. Smoke Centers (congregate shelter)

In addition, Contractor shall operate the Smoke Shelter Centers in accordance with the terms and conditions set forth below. **Annually the period that Contractor shall open when conditions below are met is June 1 to October 31:**

- a. Smoke Centers will open to the general public from Noon to 8 PM when the Air Quality Index (AQI) reaches the “Unhealthy (151-200)” level or higher in any zip code that is within 10 miles of the location of the Center. The AQI can be found at: <https://www.airnow.gov/>.

Contractor can enter the zip code into the search bar. If the ‘PM2.5 AQI’ measurement reaches the “Unhealthy (151-200)” level or higher in any zip code that is within 10 miles of the location of the Center, the condition is met for the Center to open. Zip codes specific to Contractor are:

ZIP CODE	NAME
97013	Canby
97023	Estacada
97038	Molalla
97055	Sandy

- b. Contractor shall check the above website between 8am-10am. **Contractor must announce opening by 10am** through County email distribution list and must directly notify local Fire and jurisdiction contacts as required by those authorities. The email shall be sent the same day as Smoke Center activation as notification that the Center will be open, and Contractor shall provide notification through the same email method prior to 8pm if overnight services are activated.
- c. If the ‘PM2.5 AQI’ measurement reaches the “Unhealthy (151-200)” level or higher in any of the Zip Codes listed after 10am, after Contractor has already checked the conditions at the [https://www.airnow.gov/ website](https://www.airnow.gov/) on the same day, Contractor will

- have the option of opening the site for reimbursement.
- d. If there is no time period issued at <https://www.airnow.gov/> for the ‘Unhealthy’ level duration, Contractor shall check the AQI measurement again between 6pm and 8pm to determine if the site should remain open for overnight shelter.
 - e. If the Unhealthy Air Quality extends past 8 PM, County will provide an additional per person reimbursement for each guest who accesses overnight shelter. **Overnight hours: 8pm to 8am.**
 - f. Cold beverages must be available to every guest, and facilities must be air conditioned and have restrooms available.
 - g. Smoke Centers must provide a minimum of two staff or volunteers during all hours of operation. If more than 30 guests are on site, from the hours of 6pm to 10pm, additional volunteers or staff are strongly recommended to provide safety for all guests, staff, and volunteers. If overnight is opened, the hours of 10pm to 7am volunteers or staff will provide fire watch and safety check requirements. Contractor shall require staff and volunteers to document shift times to show minimum requirement was met on Sign-in Sheets.
 - h. Contractor will be paid on a per-person per day basis for days that a smoke center is open under the authorization of Clackamas County, up to an amount not to exceed the total contracted budget. Occupancy cannot exceed the established occupancy guidelines for the site.
 - i. The email distribution list will be provided to Contractor at Agreement execution and at the start of each season. Contractor must directly notify local Fire and jurisdiction contacts as required by those authorities. Once the email notification of opening has been sent out, Contractor is expected to remain open for services, even if the condition to open changes and is not met after the email announcement is sent
 - j. County may direct sites to open under **other conditions**. Alternate opening can be negotiated with unusual circumstances but must be pre-approved by County prior to site opening.
 - k. The COUNTY may approve **Hotel/Motel Shelter (non-congregate shelter)** in areas where there is no available congregate shelter.

PERFORMANCE REPORTING SCHEDULE AND REQUIREMENTS

Contractor agrees to report data as outlined below to the County:

- 1 Enter guest count data for warming nights by 8 am the next morning and enter guest count data for cooling and smoke day opening by 8 am following the morning of opening as indicated on online shared Google Document Sheets, to be provided by County.
- 2 HMIS is a community-wide software solution that is designed to collect client-level information on the characteristics and service needs of people experiencing homelessness. Contractor is required to:
 - a. Collect participant demographics and enter data electronically into HMIS into appropriate HMIS providers, which will be determined by County.
 - b. Ensure that data entry into HMIS occurs in an accurate and timely manner within three (3) business days of program entry date. Contractor must correct data quality, missing information, and null data errors as specified by County prior to invoice submittals, and by the 10th of each month for services in the preceding month.
 - c. Collect, at minimum, universal data elements which include demographic information on all guests experiencing homelessness and housed guests at entry and Re-Entry for warming, cooling and smoke openings. A Sign-in sheet must be completed each night Contractor is open for warming.
 - d. For cooling and smoke shelter, two separate Sign-in sheets must be completed: one for guests staying during the day and one Sign-in sheet for guests that stay overnight, but the HMIS data will only need to be entered one time per 24 hour period.
 - e. For guests experiencing homelessness, an HMIS Entry form shall be completed for each client on their first night of stay for warming and on the first day of stay for cooling or smoke. Clients should complete the Entry form only once per client. On subsequent stays at the sites during the Agreement term, repeat clients must complete the HMIS Data Re-Entry form.
 - f. Staff or trained volunteers must review all HMIS forms for completeness and legibility, and County's preference is that guests be assisted by site staff in completion of each required form to understand the questions being asked.
 - g. For housed guests, County will provide Contractor a Housed Guest data collection form to be completed by guests. Contractor shall first ask if the guest is housed to determine whether the HMIS forms (guests experiencing homelessness) or a Housed Guest data collection form (housed guest) is appropriate for guest to complete. Housed Guest data will not be entered into HMIS but shall have complete information to be reimbursable.

- h. Use County's approved, secure email system to submit invoices and Sign-in sheets, and Housed Guest forms. HMIS Entry and Re-Entry forms do not need to be submitted electronically, but must be retained by Contractor as noted above, and may be requested for additional invoice verification by County.
- i. Collect and retain copies of invoices, Sign-in sheets, and HMIS Entry and Re-Entry, and Housed Guest paper forms in a secure, locked location for required monitoring by County. Template forms for invoices, Sign-in sheets, and HMIS Entry and Re-Entry will be provided to Contractor by County.
- j. Attend meetings and HMIS training hosted by County.
- k. Enter into an agreement with County Community Development division for access to HMIS.
- l. Ensure only authorized Contractor staff trained by County shall access the HMIS software. Contractor is required to maintain all Sign-in sheets, HMIS forms, and Housed Guest forms, in a locked file on site for audit and monitoring by County regardless of electronic or hardcopy collection.
- m. Review HMIS data and Sign-in sheets prior to electronic entry into HMIS software and make every effort to collect data that is legible and complete. Data that County determines is incomplete will not be reimbursed.
- n. Shall comply with current HMIS Policy and Procedures and adhere to all HMIS reporting requirements.

County staff:

Claire Okeke: cokeke@clackamas.us (Public and Government Affairs)

Eric Wegener: ewegener@clackamas.us (Housing & Community Development - HMIS)

Vahid Brown: vbrown@clackamas.us (Housing & Community Development Deputy Director)

Emergency Operations Center (EOC):

clackemdutyofficer@clackamas.us

211 Info staff:

support@211Info.org

EXHIBIT B
2023-25 MASTER GRANT AGREEMENT #8018

(COUNTY to email to CONTRACTOR at Agreement execution)

EXHIBIT C
Additional Terms and Conditions

Contractor shall perform the services authorized by this Amendment #4 in a manner satisfactory to the State of Oregon, Oregon Housing and Community Services department (“OHCS”), and in compliance with all program requirements, including but not limited to the following terms and conditions:

General:

- 1) Contractor shall assure that program funds are used only for program services consistent with program requirements.
- 2) Contractor shall assure that program funds are used to supplement existing funding, to support existing projects or to establish new projects. Program funds may not be used to replace existing funding.
- 3) Contractor shall ensure that program funds are expended within the time limitations set by OHCS. Program funds not expended within the time period shall be recaptured by County and OHCS.
- 4) Contractor shall serve only certified households whose eligibility has been determined in compliance with program requirements.
- 5) Contractor is responsible to County & OHCS for any losses resulting from improper or negligent issuance of program funds and shall repay such funds to County/OHCS within 30 days upon written demand from County/OHCS.
- 6) Have denial, termination, appeal and fair hearing procedures accessible to program applicants and participants upon request and posted in a public location. Such procedures must satisfy applicable program requirements including assurance that all applicants are informed during the intake interview of their right to appeal. All appeals and fair hearings will be handled by the County. Denial, termination, appeal and fair hearing procedures, including as implemented, are subject to department review and correction.
- 7) Contractor may terminate program services to program participants who violate program requirements. Termination, denial and grievance procedures will be clearly communicated to and easily understood by program participants and readily available upon request and posted in a public location.
- 8) Be responsible for maintaining an internal controls framework, satisfactory to County and OHCS, which assures compliance with program requirements. Written policy and procedures must be established and outlined in local documentation (e.g. staff policy/procedure manuals) inclusive of, but not exclusive to the following areas:
 - a) Assurance that completed applications and household benefits are valid and correct. This includes adequate separation of duties among intake, authorization and fiscal staff.

- b) Establishment and maintenance of clear policy for cases where there may be a conflict of interest. This includes procedures for staff when employees, board members, friends or family members apply for program services.
 - c) Establishment and maintenance of clear procedures for management of program applicants and participants who may have committed fraud and for dealing with public complaints regarding potential fraud. All incidents of fraud must be reported to County and OHCS.
 - d) Establishment and maintenance of clear procedures for preventing, detecting, and dealing with employee fraud. All incidents of fraud must be reported to OHCS.
- 9) Allow County, OHCS and its representatives access to, and to furnish whatever information and/or documentation County, OHCS and its representatives determines is necessary or appropriate to conduct reviews and monitor progress or performance to determine conformity with program requirements. Contractor shall permit County, OHCS and its representatives to visit its sites to inspect same, and to review, audit, and copy all records County and OHCS and its representatives deem pertinent to evaluating or enforcing program requirements at any reasonable time, with or without benefit of prior notification. Contractor shall cooperate fully with County, OHCS and its representatives.
- 10) Maintain accurate financial records satisfactory to the department, which document, *inter alia*, the receipt and disbursement of all funds provided through the program by the department; and have an accounting system in place satisfactory to the department, which meets, *inter alia*, generally accepted accounting principles.
- 11) Maintain other program records satisfactory to the department, which document, *inter alia*, client eligibility requirements, receipt of allowable program services, termination of services and the basis for same, housing and income status of clients, administrative actions, contracts with subcontractors, review of subcontractor performance, action taken with respect to deficiency notices, and any administrative review proceedings. Such records shall be in substance and format satisfactory to the department.
- 12) Provide the County and OHCS with reports, data, and financial statements, in form and substance satisfactory to the department, as may be required or requested from time to time by the department, which shall be in a format prescribed by the department.
- 13) Furnish representatives of the department, the Oregon Secretary of State's Office, the federal government, and their duly authorized representatives' access to and permit copying of all books, accounts, documents, records and allow reasonable access to the project and other property pertaining to the program, at any such representative's request.
- 14) Assure that data collection and reporting, including data entry for program funded activities, be conducted through the use of a County and OHCS approved HMIS, where applicable by program requirements.

- 15) Ensure that data collection, entry and reporting occur in an accurate and timely manner as satisfactory to County and OHCS.
- 16) Indemnity. Subject to applicable law, Contractor shall, defend, save, hold harmless, and indemnify (consistent with ORS Chapter 180) the State of Oregon and OHCS and their officers, employees and agents from and against all claims, suits, actions, losses, damages, liabilities, costs and expenses of any nature whatsoever resulting from, arising out of, or relating to the activities of County, Contractor, or its officers, employees, Subrecipients, subcontractors, or agents under this Agreement.
- 17) Contractor understands and agrees that this agreement is subject to termination upon such a directive to County by OHCS, and that OHCS shall not be liable to any of the parties of this agreement or to other persons for directing that such agreement be terminated.
- 18) Contractor shall comply and perform all work to the satisfaction of County and OHCS, and in accordance with the terms of this agreement, together with applicable program requirements including OAR 813 .046 as amended, and ORS 458.600 to 458.650. The approved County work plan is incorporated herein by reference. The remaining provisions of Section 2B are supplemental to, and do not limit the obligations of Contractor arising under this Subsection A or otherwise under this agreement.
- 19) Contractor is expected to further equity and racial justice practices by partnering with Culturally Responsive Organizations, defined by OHCDS.
- 20) Contractor must have either written documentation in applicant/participant files that a privacy notification was provided to participants or a standalone policy describing how applicants/participants are provided the privacy notification. The privacy notification must be provided as follows, verbatim:

“Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services and other state agencies with an information sharing agreement with OHCS and are administering programs that serve the same or similar clients or populations, as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and will be disclosed to Oregon Housing and Community Services without written authorization.”

If applicants/participants are requested to sign a Release of Information, in addition to the statement above, the Release must include the following statement:

“Refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible applicants/participants. Applicant/Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will deidentify applicant/participant demographic data for the purposes of reporting”.

- 21) Requirement for subgrantee to have a policy addressing applicant/participant grievance and appeal requests. Subgrantee must also ensure Contractor has a policy aligning with OHCS requirements.

Applicants/participants have right to appeal any decision denying or affecting their service and must receive written notice of any such decision. Grievance/appeal policy must either be in public place or provided to applicants/participants. Reviews/appeals can be conducted only by someone other than the person who made the decision being appealed/grieved.

Specific requirements listed for policy:

- (1) Informs the participant/applicant that they can contest any subgrantee's or subrecipient's decision that terminates, denies, limits reduces or modifies any benefits and identifies the steps to follow to contest the decision;
 - (2) Informs the participant/applicant of the reason for termination, denial, limitation, reduction or modification of benefit;
 - (3) Allows any aggrieved person a minimum of thirty (30) days to request an administrative review/appeal of such decision;
 - (4) Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
 - (5) Identifies what reasonable accommodations are available for applicant/participants who have language, mobility or disability barriers that would prevent them from participating in the review/appeal process and how to request such accommodations; and
 - (6) Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten (10) days of the final determination.
- 22) Contractor must have an Limited English Proficiency (LEP) policy. Contractor is obligated to ensure LEP persons have access to programs and activities. Language Access Plan is recommended if provider serves more than a "few" persons with LEP.
- 23) Contractor must have COI policy that delineates process for disclosing potential and actual conflicts of interest. Includes procedures for staff when employees, board members, friends, or family members apply for services. Evaluation to obtain services cannot be performed by any person with an actual or perceived potential conflict of interest. Must retain records showing compliance with program COI requirements. Defines organizational and individual COI.
- 24) Contractor is Requirement for subgrantee to have nondiscrimination policy and follow fair housing and reasonable accommodation laws. Subgrantee must ensure subrecipient has a policy that aligns. Having a target population or priority population cannot be used as a means of denying assistance or refusing an application to any member of a protected class.

Monitoring of Contractor:

A) OHCS & County Authorized to Monitor Contractor. OHCS may monitor the activities and records of Contractor as it deems necessary or appropriate, among other things, to ensure Contractor complies with the terms of this Agreement, including Program Requirements, and that grant funds are used properly and only for authorized purposes hereunder. OHCS also may monitor the activities and records of Contractor to ensure that performance goals are achieved as specified in this Agreement, and that performance is to the satisfaction of OHCS.

Monitoring activities may include any action deemed necessary or appropriate by OHCS including, but not limited to the following:

- (1) the review (including copying) from time to time of any and all Contractor files, records and other information of every type arising from or related to performance under this Agreement;
- (2) arranging for, performing, and evaluating general and limited scope audits;
- (3) conducting or arranging for on-site and field visits and inspections;
- (4) review of Contractor fiscal and program reports, and requiring appropriate reimbursement request documentation as well as such other information and clarification as it deems appropriate, prior to providing a reimbursement request approval, whether in whole, in part, or otherwise; and
- (5) evaluating, training, providing technical assistance and enforcing compliance of Contractor and their officers, employees, agents, contractors, and other staff. OHCS may utilize third parties in its monitoring and enforcement activities, including monitoring by peer agencies. OHCS monitoring and enforcement activities may be conducted in person, by telephone and by other means deemed appropriate by OHCS and may be affected through contractors, agents, or other authorized representatives. Contractor consents to such monitoring and enforcement by OHCS and agrees to cooperate fully with same. OHCS reserves the right, at its sole and absolute discretion, to request assistance in monitoring from outside parties including, but not limited to the Oregon Secretary of State, the Attorney General, the federal government, and law enforcement agencies.

B) Contractor Shall Fully Cooperate. Contractor shall fully and timely cooperate with OHCS in the performance of any and all monitoring and enforcement activities. Failure by Contractor to comply with this requirement is sufficient cause for OHCS to require special conditions, take such other action (including the exercise of available remedies) as it deems appropriate, and may be deemed by OHCS as a material failure by the Contractor to perform its obligations under this Agreement.

C) County Shall Monitor Contractor. County shall perform onsite visits to monitor the activities of Contractor as is reasonable to ensure compliance with (and as necessary under) applicable Program Requirements or as otherwise directed by OHCS, but in no case less than at least once during Biennium 23-25. The activities of any Contractor shall be monitored to ensure, *inter alia*, that grant funds are used only for authorized purposes in compliance with this Agreement, including but not limited to specific Program Requirements, and that performance goals are achieved as specified. County monitoring will include an evaluation of Contractor's risk of non-compliance with federal statutes, regulations, and terms and conditions of any applicable subaward for purposes of determining the appropriate level and type of monitoring. Monitoring also must include a review of financial and performance reports, and follow-up on all deficiencies pertaining to any involved federal funding in accordance with 2 CFR 200.331 and other applicable federal regulations, if any. Contractor may request County's '**Contractor Policy and Procedures for Monitoring**'.

D) OHCS may review (including copying) from time to time any and all Contractor files, records, and other information of every type arising from or related to performance under this Agreement. Within 60 days after a review, OHCS will endeavor to communicate in writing to the County. OHCS may advise County of any corrective action that it deems appropriate based upon its monitoring activities or otherwise of Contractor. Contractor shall timely satisfy such corrective actions as reasonably required by OHCS.

Confidentiality:

A) Contractor shall protect the confidentiality of all information concerning Clients and other applicants for and recipients of services funded by this Agreement. Neither it nor they shall release or disclose any such information, except as necessary for the administration of the Community Services program(s) funded under this Agreement, as authorized in writing by the Client or other applicant or recipient of such services, or as required by law. All records and files shall be appropriately secured to prevent access by unauthorized persons. Contractor is required to ensure that all its and their officers, employees and agents are aware of and comply with this confidentiality requirement.

B) All Contractor, provider, and project staff members are expected to comply with the most current local, state, and federal laws regarding confidentiality. Information in any form, including in aggregate, shall not be released to any party without the authorization of the individual and/or County. Client information (including identifying the person as a client) should not be released without written authorization from the client.

C) Contractor is required to have a signed Contractor Release of Information (ROI) form for all clients authorizing the release of information pertinent to determining program eligibility, providing assistance/service, HMIS reporting, and other relevant needs for sharing information. Release forms must be time-limited and specific as to with whom and what information will be shared. Written ROI's must be obtained from all clients to Contractor and County Oregon Housing & Community Services Department (OHCS)

must be routinely listed as an entity with which client information will be shared as it pertains to data collection and monitoring (including third-party adults and reviews).

- D) Contractor shall ensure that all officers, employees, and agents are aware of and comply with this confidentiality requirement.
- E) Requirement for subgrantee to have a confidentiality policy satisfying OHCS requirements + must ensure subrecipient policies align, as well. There is a DV shelter confidentiality provision.

Record Retention:

- A) Contractor shall prepare and maintain such records as necessary for performance of and compliance with the terms of this Agreement, which in no event will be less than six (6) years after the termination of this Agreement.
- B) Contractor shall retain all records pertinent to expenditures incurred under this Agreement and otherwise in a manner consistent with the requirements of state and federal law, including but not limited to those requirements listed in OHCS' Record Retention Schedule, as may be modified from time to time. Notwithstanding the above, if there is litigation, claims, audits, negotiations or other action that involves any of the records cited, then such records must be retained until final completion of such matters.
- C) Contractor shall retain all program records pertinent to client services and expenditures incurred in a manner consistent with the requirements of state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Operations Manual and Special Schedules and the OHCS Record Retention Schedule.

Additional Requirements:

- A) Organization must provide services to clients without regard to race, religion, national origin, sex, age, marital status, sexual orientation, disability (as defined under the Americans with Disabilities Act) or any other protected class as defined in applicable state and federal law. Contracted services must reasonably accommodate the cultural, language and other special needs of clients.
- B) Contractor will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and in accordance with Title VI of that Act, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity covered by this contract.
- C) Contractor will comply with Executive Order 11246, entitled "Equal Employment Opportunity," as amended by Executive Order 11375, and as supplemented in Department of Labor Regulations (41 CFR Part 60).
- D) Organizations are required to perform Criminal Background checks and propose for approval specific screening criteria for all staff and volunteers who will be performing direct services under this contract. Policies must be in place to disqualify any persons who

have committed violent crimes, crimes against children or other crimes that are incompatible with this project. Policies must also be in place to ensure the safety of participants should criminal convictions occur during the term of the project.

- E) Contractor will establish safeguards to prohibit employees and volunteers from using their positions for a purpose that is or gives the appearance of being motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business, or other ties.
- F) Contractor certifies, to the extent required by federal law, that it will provide a drug free workplace by:
- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution dispensation, possession, or use of a controlled substance is prohibited in Contractor's workplace and specifying the actions that will be taken against employees for violation of such prohibition.
 - (b) Establishing a drug-free awareness program to inform employees about:
 - (1) The dangers of drug abuse in the workplace;
 - (2) Contractor'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.
 - (c) Making it a requirement that each employee to be engaged in the performance of this contract be given a copy of the statement required by subsection (a) above.
 - (d) Notifying the employee in the statement required by subsection (a) that as a condition of employment on such contract, the employee will:
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.
 - (e) Notifying the Contractor within 10 days after receiving notice under subsection (d)(2) from an employee or otherwise receiving actual notice of such conviction
 - (f) Imposing a sanction on, or requiring the satisfactory participation in a drug abuse assistance or rehabilitation program by, any employee who is so convicted, as required by Section 5154 of the Drug-Free Workplace Act of 1988.
 - (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of subsections (a) through (f).
- G) Contractor certifies to the best of its knowledge and belief that neither it nor any of its principals, officers, directors, or employees:

- (a) Are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or Contractor;
- (b) Have within a three-year period preceding this agreement been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under 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;
- (c) Are 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 (b) above, of this certification; and
- (d) Have within a three-year period preceding this agreement had one or more public transactions (federal, state or local) terminated for cause or default.
- (e) Is included on the list titled "Specially Designated Nationals and Blocked Persons" maintained by the Office of Foreign Asset Control of the United States Department of the Treasury and currently found at:
http://www.treas.gov/offices/enforcement/ofac/sdn/tl_lsdn.pdf

Financial Assistance Application Lifecycle Form

Use this form to track your potential award from conception to submission.

Sections of this form are designed to be completed in collaboration between department program and fiscal staff.

If renewal or direct appropriation, complete sections I, II, IV & V only. Section III is not required.

If Disaster or Emergency Relief Funding, EOC will need to approve prior to being sent to the BCC

****CONCEPTION****

Section I: Funding Opportunity Information - To Be Completed by Requester

Award type: Direct Appropriation (no application)
 Subrecipient Award Direct Award

Award Renewal? Yes No

Lead Fund # and Department:	100 / 21
Name of Funding Opportunity:	FY24 Safer Outcomes: Enhancing De-Escalation and Crisis Response Training for Law Enforcement – Curriculum Integration for Law Enforcement Academies and State-Level Training Commissions

Funding Source: Federal – Direct Federal – Pass through State Local

Requestor Information: (Name of staff initiating form)	Ke'ala Adolpho
Requestor Contact Information:	(503) 201-5697 kadolpo@clackamas.us
Department Fiscal Representative:	Ke'ala Adolpho
Program Name & Prior Project #: (please specify)	No prior project #

Brief Description of Project:

The goal of this solicitation is to promote safe outcomes during police encounters with persons in crisis through the integration of de-escalation and crisis response training into the curriculum of law enforcement academies and state-level training commissions. If awarded the funding, CCSO will purchase a new use-of-force scenario simulator for CCSO. Our existing MLO system is a single screen system and utilizes composite training guns with no re-coil/function beyond trigger pull; the system is outdated presently and many of our long term employees have habituated to the scenarios offered.

Name of Funding Agency: U.S. Department of Justice - Office of Community Oriented Policing Services

Notification of Funding Opportunity Web Address: https://cops.usdoj.gov/pdf/2024ProgramDocs/saferoutcomes/Curriculum_Integration_solicitation.pdf

OR

Application Packet Attached: Yes No

Completed By: Ke'ala Adolpho Date: 6/25/24

**** NOW READY FOR SUBMISSION TO DEPARTMENT FISCAL REPRESENTATIVE ****

Section II: Funding Opportunity Information - To Be Completed by Department Fiscal Rep

Competitive Application Non-Competing Application Other

Assistance Listing Number (ALN), if applicable:	16.710	Funding Agency Award Notification Date:	10/01/2024
Announcement Date:	05/30/2024	Announcement/Opportunity #:	O-COPS-2024-172149
Grant Category/Title	COPS Grant	Funding Amount Requested:	\$265,000
Allows Indirect/Rate:	Yes	Match Requirement:	None
Application Deadline:	07/23/2024	Total Project Cost:	\$265,000
Award Start Date:	10/01/2024	Other Deadlines and Description:	Grants.gov - 74/223/24 JustGrants - 7/30/2024
Award End Date	09/30/2026		
Completed By:	Ke'ala Adolpho	Program Income Requirements:	N/A
Pre-Application Meeting Schedule:			

Additional funding sources available to fund this program? Please describe:

None

How much General Fund will be used to cover costs in this program, including indirect expenses?

None

How much Fund Balance will be used to cover costs in this program, including indirect expenses?

N/A

In the next section, limit answers to space available.

Section III: Funding Opportunity Information - To Be Completed at Pre-Application Meeting by Dept Program and Fiscal Staff

Mission/Purpose:

1. How does the grant/funding opportunity support the Department and/or Division's Mission/Purpose/Goals?

The COPS Office Safer Outcomes: Enhancing De-Escalation and Crisis Response Training for Law Enforcement – Curriculum Integration for Law Enforcement Academies and State-Level Training Commissions program provides funding to law enforcement training academies and state-level regulatory bodies with the goal of promoting safe outcomes during police encounters with persons in crisis through the integration of de-escalation and crisis response training into their curricula.

2. Who, if any, are the community partners who might be better suited to perform this work?

None

3. What are the objectives of this funding opportunity? How will we meet these objectives?

One or more of the following: training deliveries; training curriculum development, training aides created; policies created or revised; standards created or revised; presentations, reports, or data relevant to the projects funded through this grant; evaluations of the effectiveness of new or enhanced training integration.

4. Does the grant/financial assistance fund an existing program? If yes, which program? If no, what is the purpose of the program?

No, the grant does not fund an existing program.

Organizational Capacity:

1. Does the organization have adequate and qualified staff? If no, can staff be hired within the grant/financial assistance funding opportunity timeframe?

Yes

2. Are there partnership efforts required? If yes, who are we partnering with and what are their roles and responsibilities?

Partnering with county facilities regarding necessary work needed to be able to install the simulator into the existing space and the cost of that has been included in this request.

3. If this is a pilot project, what is the plan for sun setting the project and/or staff if it does not continue (e.g. making staff positions temporary or limited duration, etc.)?

Not a pilot project

4. If funded, would this grant/financial assistance create a new program, does the department intend for the program to continue after initial funding is exhausted? If yes, how will the department ensure funding (e.g. request new funding during the budget process, supplanted by a different program, etc.)?

Funding does not create a new program, but allows CCSO to purchase a new use-of-force simulator to replace the aging one currently in use.

Collaboration

1. List County departments that will collaborate on this award, if any.

County facilities

Reporting Requirements

1. What are the program reporting requirements for this grant/funding opportunity?

Programmatic performance reports are due semiannually.

2. How will performance be evaluated? Are we using existing data sources? If yes, what are they and where are they housed? If not, is it feasible to develop a data source within the grant timeframe?

Performance will be measured against set program goals. Data will be collected on a periodic basis through performance reports. Enhancement will be needed to existing data sources which will be feasible during the grant timeframe.

3. What are the fiscal reporting requirements for this funding?

Quarterly standard SF-425 and FFRs

Fiscal

1. Are there other revenue sources required, available, or will be used to fund the program? Have they already been secured? Please list all funding sources and amounts.

None

2. For applications with a match requirement, how much is required (in dollars) and what type of funding will be used to meet it (CGF, In-kind, local grant, etc.)?

N/A

3. Does this grant/financial assistance cover indirect costs? If yes, is there a rate cap? If no, can additional funds be obtained to support indirect expenses and what are those sources?

This financial assistance is to purchase equipment and therefore no indirect cost would be applied against it.

Other information necessary to understand this award, if any.

Program Approval:

Ryan Brown

6/25/24

Ryan Brown

Name (Typed/Printed)

Date


Signature

**** NOW READY FOR PROGRAM MANAGER SUBMISSION TO DIVISION DIRECTOR ****

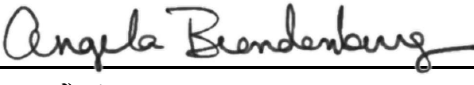
****ATTACH ANY CERTIFICATIONS REQUIRED BY THE FUNDING AGENCY. COUNTY FINANCE OR ADMIN WILL SIGN****

Section IV: Approvals


DIVISION DIRECTOR (or designee, if applicable)

Undersheriff Jenna Morrison	6/26/24	
Name (Typed/Printed)	Date	Signature

DEPARTMENT DIRECTOR (or designee, if applicable)

Sheriff Angela Brandenburg	6/27/24	
Name (Typed/Printed)	Date	Signature

FINANCE ADMINISTRATION

Elizabeth Comfort	6.27.2024	
Name (Typed/Printed)	Date	Signature

EOC COMMAND APPROVAL (WHEN NEEDED FOR DISASTER OR EMERGENCY RELIEF APPLICATIONS ONLY)

Name (Typed/Printed)	Date	Signature

Section V: Board of County Commissioners/County Administration

(Required for all grant applications. If your grant is awarded, all grant awards must be approved by the Board on their weekly consent agenda regardless of amount per local budget law 294.338.)

For applications \$150,000 and below:

COUNTY ADMINISTRATOR	Approved: <input checked="" type="checkbox"/>	Denied: <input type="checkbox"/>
Gary Schmidt	July 15, 2024	
Name (Typed/Printed)	Date	Signature

For applications up to and including \$150,000 email form to BCC staff at CA-Financialteam@clackamas.us for Gary Schmidt's approval.

For applications \$150,000.01 and above, email form with Staff Report to the Clerk to the Board at ClerktotheBoard@clackamas.us to be brought to the consent agenda.

BCC Agenda item #: Date:

OR

Policy Session Date:

County Administration Attestation

County Administration: re-route to department at
and
Grants Manager at financegrants@clackamas.us
when fully approved.

Department: keep original with your grant file.

U.S. Department of Justice

Office of Community Oriented Policing Services



FY24 Safer Outcomes: Enhancing De-Escalation and Crisis Response Training for Law Enforcement – Curriculum Integration for Law Enforcement Academies and State-Level Training Commissions

Assistance Listing #:	16.710
Grants.gov Opportunity Number:	O-COPS-2024-172149
Solicitation Release Date:	May 30, 2024 1:00 PM ET
Grants.gov Deadline:	July 23, 2024 4:59 PM ET
Application JustGrants Deadline:	July 30, 2024 4:59 PM ET

Overview

The U.S. Department of Justice, Office of Community Oriented Policing Services (COPS Office, <https://cops.usdoj.gov>) is pleased to announce that it is seeking applications for funding for the FY24 Safer Outcomes: Enhancing De-Escalation and Crisis Response Training for Law Enforcement – Curriculum Integration for Law Enforcement Academies and State-Level Training Commissions program.

The COPS Office welcomes applications under which two or more entities would carry out the federal award; however, only one entity may be the applicant. Any other entities carrying out the federal award must be identified as proposed subrecipients. The applicant must be the entity that would have primary responsibility for carrying out the awards, including administering the funding, managing the entire project and monitoring compliance.

The terms and conditions of the federal award are also applicable to subrecipients. Please note the distinction between a subaward that creates a financial assistance relationship to carry out a portion of the federal award and a contract that creates a procurement relationship for the purchase of goods and services needed under the federal award. To assist in making subrecipient and contractor determinations, please refer to the guidance in 2 C.F.R. § 200.331.

All awards are subject to the availability of appropriated funds and any modifications or additional requirements that may be imposed by law.

Eligibility

Eligibility for the FY24 Safer Outcomes: Enhancing De-Escalation and Crisis Response Training for Law Enforcement – Curriculum Integration for Law Enforcement Academies and State-Level Training Commissions program is limited to law enforcement training academies that deliver a curriculum of

basic law enforcement instruction required for certification and employment in sworn officer positions for state, local, tribal, or territorial law enforcement agencies and state-level regulatory bodies with the authority to establish training standards or mandate training curriculum for law enforcement officers in the state, commonly referred to as Police Officer Standards and Training Commissions or Peace Officer Standards and Training Commissions (POST Commissions).

Contact Information

Agency Contact Description

Applications must be submitted through both Grants.gov and the JustGrants system.

For technical assistance with submitting the Application for Federal Assistance, Standard Form 424 (SF-424), please call the Grants.gov customer service hotline at 800-518-4726, send questions via email to support@Grants.gov or consult the [Grants.gov Organization Applicant User Guide](#). The Grants.gov Support Hotline operates 24 hours a day, 7 days a week, except on federal holidays.

For technical support with the Justice Grants System (JustGrants) application, please contact JustGrants Support at JustGrants.Support@usdoj.gov or 833-872-5175. JustGrants Support operates Monday through Friday between the hours of 5:00 a.m. and 9:00 p.m. Eastern Time (ET) and Saturday, Sunday, and federal holidays from 9:00 a.m. to 5:00 p.m. ET. Training on JustGrants can also be found at <https://justicegrants.usdoj.gov/training-resources>.

For programmatic assistance with the requirements of this program, please call the COPS Office Response Center at 800-421-6770 or send questions via email to AskCopsRC@usdoj.gov. The COPS Office Response Center operates Monday through Friday, 9:00 a.m. to 5:00 p.m. ET, except on federal holidays.

Submission Information

Registration: To submit an application, all applicants must be registered in SAM.gov with a Unique Entity Identifier (UEI) number and be registered in Grants.gov.

Submission: Completing an application is a two-step process:

1. Applicants are first required to register via <https://www.grants.gov>, complete the SF-424 form and if applicable the Disclosure of Lobbying Activities, Standard Form - LLL (SF-LLL), and submit it through the [Grants.gov website](#).
2. Once the SF-424 and SF-LLL have been submitted via Grants.gov, the applicant will complete the full application including survey questions and provide attachments in JustGrants.

An application is not considered submitted until both of these steps are completed. For more information about registration and submission, see the "[How to Apply](#)" section of this solicitation.

All guidance for this program is contained in this Solicitation and can also be found at <https://cops.usdoj.gov/saferoutcomes>. In addition to this Solicitation, the COPS Office “[How to Apply](https://cops.usdoj.gov/how-to-apply)” web page, [http://cops.usdoj.gov/how-to-apply](https://cops.usdoj.gov/how-to-apply), provides additional resources to help guide applicants through the process.

The complete application package (this solicitation, including links to additional documents) is available on Grants.gov and on the COPS Office website, <https://cops.usdoj.gov>.

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Program Description

The Office of Community Oriented Policing Services (COPS Office) is the component of the U.S. Department of Justice responsible for advancing the practice of community policing by the nation's state, local, territorial, and tribal law enforcement agencies through information and grant resources. The COPS Office has been appropriated more than \$20 billion to advance community policing, including grants awarded to more than 13,000 state, local and tribal law enforcement agencies to fund the hiring and redeployment of more than 136,000 officers. COPS Office information resources, covering a wide range of community policing topics such as school and campus safety, violent crime, and officer safety and wellness, can be downloaded via the COPS Office's home page, <https://cops.usdoj.gov>.

Community policing is a philosophy that promotes organizational strategies that support the systematic use of partnerships and problem-solving techniques to proactively address the immediate conditions that give rise to public safety issues such as violent crime, nonviolent crime, and fear of crime. To read an overview of the principles of community policing, please see the COPS Office publication [Community Policing Defined](#).

The COPS Office Safer Outcomes: Enhancing De-Escalation and Crisis Response Training for Law Enforcement – Curriculum Integration for Law Enforcement Academies and State-Level Training Commissions program provides funding to law enforcement training academies and state-level regulatory bodies with the goal of promoting safe outcomes during police encounters with persons in crisis through the integration of de-escalation and crisis response training into their curricula.

The COPS Office is committed to advancing work that promotes civil rights and equity, increases access to justice, supports victims of crime and individuals impacted by the justice system, strengthens community safety, protects the public from crime and evolving threats, and builds trust between law enforcement and the communities that they serve.

Statutory Authority

The COPS Program is authorized under the Omnibus Crime Control and Safe Streets Act of 1968, as amended, and the Violent Crime Control and Law Enforcement Act of 1994, Title I, Part Q, Public Law 103-322, 34 U.S.C. § 10381 et seq.

All awards are subject to the availability of appropriated funds and any modifications or additional requirements that may be imposed by law.

Program-Specific Information

- This program is authorized under the Omnibus Crime Control and Safe Streets Act of 1968, as amended, and the Violent Crime Control and Law Enforcement Act of 1994, Title I, Part Q, Public Law 103-322, 34 U.S.C. § 10381 et seq.
- All awards are subject to the availability of appropriated funds and any modifications or additional requirements that may be imposed by law.
- For all identified deliverables, the applicant should adhere to the [COPS Office Editorial and Style Manual](#). For projects that propose site-specific work, letters of support from the targeted agencies are strongly encouraged.

With any programmatic questions, please contact the COPS Office Response Center at 800-421-6770 or send questions via email to AskCopsRC@usdoj.gov. The COPS Office Response Center operates Monday through Friday, 9:00 a.m. to 5:00 p.m. ET, except on federal holidays.

Program Goals

Under this solicitation, the COPS Office seeks to support projects that allow for the identification and expansion of promising practices and produces knowledge products that follow the principles of good guidance:

- Quality-driven, with an emphasis on action statements to drive promising practices and reduce variations in performance.
- Evidence-based, with recommendations that are consistent with the weight of the best available evidence identified through systematic review.
- Accessible, with clear language and manageable lengths that are appropriate and relevant for the law enforcement field.
- Memorable, to encourage immediate actions or aid for the complex situations law enforcement professionals face.

To read an overview of the principles of community policing, please see the COPS Office publication [Community Policing Defined](#).

Applicants should also consider the COPS Office performance measures when developing their own specific project goals and activities, which can be found in the “Performance Measures” section of this application.

Safer Outcomes: Enhancing De-Escalation and Crisis Response Training for Law Enforcement – Curriculum Integration for Law Enforcement Academies and State-Level Training Commissions

Purpose

The goal of this solicitation is to promote safe outcomes during police encounters with persons in crisis through the integration of de-escalation and crisis response training into the curriculum of law enforcement academies and state-level training commissions. Partnerships with experts in adult learning concepts and curriculum development are highly encouraged. Awards under this solicitation will be made through two funding paths. Applicants will be prompted to select the funding path they wish to be considered under.

- **The Academy path** will make awards to law enforcement training academies that deliver a curriculum of basic law enforcement instruction required for certification and employment in sworn officer positions for state, local, tribal, or territorial law enforcement agencies.
- **The Commission path** will make awards to state-level regulatory bodies with the authority to establish training standards or mandate training curriculum for law enforcement officers in the state, commonly referred to as Police Officer Standards and Training Commissions or Peace Officer Standards and Training Commissions (POST Commissions).

Areas of focus

Regardless of the path selected, supported training programs must address one or more of the following areas of focus.

1. **De-escalation tactics and alternatives to use of force.** For purposes of this solicitation, the term “de-escalation” means taking action or communicating verbally or nonverbally during a potential force encounter in an attempt to stabilize the situation and reduce the immediacy of the threat so that more time, options, and resources can be called upon to resolve the situation without the use of force or with a reduction in the force necessary.
2. **Safely responding to an individual experiencing a mental or behavioral health or suicidal crisis.** Such a crisis is one in which the behavior of a person puts the person at risk of hurting himself or herself or others; or impairs or prevents the person from being able to care for himself or herself or function effectively in the community. This also includes situations in which a person is under the influence of a drug or alcohol, is suicidal, or experiences symptoms of a mental illness; or may exhibit symptoms, including emotional reactions (such as fear or anger), psychological impairments (such as inability to focus, confusion, or psychosis), and behavioral reactions (such as the trigger of a freeze, fight, or flight response).

3. **Safe encounters with individuals with disabilities.** The term “disability” has the meaning given that term in section 3 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102).
4. **Successfully participating on a crisis intervention team.** The term “crisis intervention team” means a collaborative, interdisciplinary team that brings together specially trained law enforcement officers, mental health providers, and other community stakeholders to respond to mental health related calls, use appropriate de-escalation techniques, and assess if referral to services or transport for mental health evaluation is appropriate.
5. **Making referrals to community-based services and support.** These may include referrals to mental and behavioral health services and support, housing assistance programs, public benefits programs, the National Suicide Prevention Lifeline, and other services.

Integrated curriculum

Integrated academy curriculum

Traditional academy curricula provide separate blocks of instruction on prescribed material, whereas a curriculum that integrates one or more concepts will revisit these concepts throughout the entire training program within the context of new material. Research has demonstrated that students retain information for longer intervals when exposed to material in an integrated format than in a traditional format.¹ De-escalation and crisis response concepts are ideal for integration because they are relevant within the contexts of many traditional law enforcement training domains, including use of force, criminal law, communication, and procedural justice. For more information on curriculum integration, applicants are strongly encouraged to visit <https://portal.cops.usdoj.gov/resourcecenter?item=cops-r1138> to access a publication on *Improving Learning Outcomes in Police Academy Training*, found in the COPS Office Resource Center. This publication describes a study that was conducted on the effectiveness of integrated curriculum in law enforcement academies and outlines potential promising practices that academies could employ to implement such models. Safer Outcomes awards on the Academy path are intended to provide resources for academies seeking to update, revise, and supplement basic training curricula in a way that includes integration of training on de-escalation and crisis response as described in the areas of focus.

Integrated commission curriculum

Many state POST Commissions enforce training standards or mandate various training curricula that have developed over time to reflect changes to legislation, technological advancements, and evolving responsibilities of the police profession. This changing landscape can sometimes result in a set of standards or program of training that is not clearly defined or synthesized. Safer Outcomes awards on

¹ Dianne Beer-Maxwell et al., *Improving Learning Outcomes in Police Academy Training* (Washington, DC: Office of Community Oriented Policing Services, 2023), <https://portal.cops.usdoj.gov/resourcecenter?item=cops-r1138>.

the Commission path are intended to provide resources for commissions seeking to update, revise, and supplement law enforcement training standards or mandated curricula in a way that includes integration of training on de-escalation and crisis response as described in the areas of focus.

Requirements, deliverables, and projects out of scope

Requirements

Academy path. Successful applicants will integrate de-escalation and crisis response concepts throughout a curriculum of instruction used to train sworn officer candidates within their law enforcement academy setting.

Commission path. Successful applicants will integrate de-escalation and crisis response concepts throughout the development of statewide law enforcement training standards or a program of mandated training for law enforcement officers.

The project description must include the following:

- A description of the applicant entity, including the source of the entity's authority to train and certify sworn officers
- Identification of the law enforcement agency or agencies served by the applicant entity
- A description of the applicant entity's training program for sworn officer candidates, including the duration of the program, the frequency of new academy classes, the size of academy classes, and the total number of instruction hours (Academy path only)
- A description of the applicant entity's role in regulating and promoting training for law enforcement in the state (Commission path only)
- A description of how the proposed program addresses one or more of the areas of focus described in the solicitation documents
- Identification of key project staff, including a description of relevant experience and capacity to complete project deliverables and, if the applicant is proposing to hire staff with project funds, a description of new positions proposed
- A detailed explanation of how requested funding will be used to develop, revise, or enhance an integrated curriculum
- An explanation of how equipment or technology, if any, purchased to support curriculum development or training will support a broader initiative of de-escalation and crisis response focused curriculum integration
- A detailed description of project deliverables
- A description of how the proposed program is supported by academy or commission leadership

Priority consideration may be given to applications that demonstrate one or more the following:

- The proposed training program has been certified by a nationally recognized certification program or a state POST Commission or developed by the U.S. Department of Justice.
- The program shows a commitment to follow-up assessment of training to determine knowledge retention and self-reported real world skill usage.
- Training participants take part in scenario-based exercises and receive feedback on performance from instructors.
- The program includes partnership with mental health professionals or persons with first-person perspectives relevant to the content.
- The program includes partnership with experts.
- The program has a multidisciplinary focus, designed to increase communication and collaboration among law enforcement, emergency communications and dispatch personnel, nonsworn public safety personnel, and mental health and social service professionals.

Deliverables

The expected project deliverable(s) should be clearly identified in the application. Deliverables might include one or more of the following:

- Training deliveries
- Training curriculum development
- Training aides created (e.g., videos, toolkits, presentations)
- Policies created or revised
- Standards created or revised
- Presentations, reports, or data relevant to the projects funded through this grant
- Evaluations of the effectiveness of new or enhanced training integration

Projects out of scope

- Applicants that are not law enforcement training academies or state-level regulatory bodies with the authority to establish training standards or mandate training curriculum for law enforcement will not be considered.
- Training programs that focus solely on hands-on tactical training, force-on-force skill building, or other topic areas that do not directly contribute to the implementation of a de-escalation mindset among officers or deputies will not be considered.

- Applicants that exclusively seek to purchase equipment or technology without connecting it to a broader training program in de-escalation or crisis response will not be considered.
- Applicants that seek to implement training without integrating it into a broader curriculum or program will not be considered.

Federal Award Information: Awards, Amounts and Durations

Anticipated Number of Awards

10

Anticipated Maximum Dollar Amount of Awards

\$500,000 per award

Period of Performance Start Date

October 1, 2024

Period of Performance Duration (months)

24 months

Anticipated Total Amount to be Awarded under Solicitation

\$5,000,000

Federal Award Information

Depending on the quality of applications received and the availability of funding, the COPS Office may not fund every topic or subcategory or may make additional or larger awards under one or more topic area or subcategory. In addition, the COPS Office reserves the right to revise the scope of the project in an application submission and modify the associated budget proposal accordingly.

All awards are subject to the availability of appropriated funds and any modifications or additional requirements that may be imposed by law. With limited funding, the COPS Office expects a competitive solicitation.

Length of Award

The COPS Office expects to make the project period for the grant 24 months.

Type of Award

The COPS Office will make this award in the form of grants, which do not provide for substantial involvement between the federal awarding agency and the nonfederal entity in carrying out the activity contemplated by the federal award. Grant recipients will be responsible for day-to-day project management and may reach out to the COPS Office with assistance in implementing the award. However, grant recipients will need to work with the COPS Office program manager in situations stated in the terms and conditions, such as scope changes and extensions.

Cost Sharing or Match

There is no requirement for cost sharing or a local match for the award.

Eligibility Information

Open to law enforcement training academies that deliver a curriculum of basic law enforcement instruction required for certification and employment in sworn officer positions for state, local, tribal, or territorial law enforcement agencies and state-level regulatory bodies with the authority to establish training standards or mandate training curriculum for law enforcement officers in the state, commonly referred to as Police Officer Standards and Training Commissions or Peace Officer Standards and Training Commissions (POST Commissions).

Application and Submission Information

The complete application package (this solicitation, including links to additional documents) is available on Grants.gov and on the COPS Office website <https://cops.usdoj.gov/>.

Completing an application under this program is a two-step process. Applicants must first register via <https://www.grants.gov> and complete an Application for Federal Assistance, Standard Form 424 (SF-424), the government-wide standard application form for federal assistance and the of Lobbying Activities, Standard Form - LLL (SF-LLL). The remainder of the application will be completed through the JustGrants System at <https://justicegrants.usdoj.gov/>.

Applicants are strongly recommended to register immediately on <https://www.grants.gov>. Any delays in registering with Grants.gov or submitting the SF-424 may result in insufficient time for processing your application through JustGrants.

No other form of application will be accepted. Applications with errors or missing information may be disqualified or rated accordingly. Please note that the application system will not accept incomplete applications or applications with errors.

For technical assistance with submitting the SF-424, please call the Grants.gov customer service hotline at 800-518-4726, send questions via email to support@Grants.gov, or consult the [Grants.gov Organization Applicant User Guide](#). The Grants.gov Support Hotline operates 24 hours a day, 7 days a week, except on federal holidays.

For technical support with the Justice Grants System (JustGrants) application, please contact JustGrants Support at JustGrants.Support@usdoj.gov or 833-872-5175. JustGrants Support operates Monday through Friday between the hours of 5:00 a.m. and 9:00 p.m. Eastern Time (ET) and Saturday, Sunday, and federal holidays from 9:00 a.m. to 5:00 p.m. ET. Training on JustGrants can also be found at <https://justicegrants.usdoj.gov/training-resources>.

For programmatic assistance with the requirements of this program, please contact the COPS Office Response Center at AskCopsRC@usdoj.gov. The COPS Office Response Center operates Monday through Friday, 9:00 a.m. to 5:00 p.m. ET, except on federal holidays.

Content and Form of Application

This section describes in detail what an application must include. Failure to submit an application that contains all of the specified elements may negatively affect the review of its application; and should a decision be made to make an award, such failure may result in the inclusion of award conditions that prevent the recipient from accessing or using award funds until the recipient satisfies the special conditions and the COPS Office makes the funds available. Applicants must comply with any word and field limit requirements described in this solicitation.

Moreover, applicants should anticipate that an application that the COPS Office determines does not address the scope of the solicitation or does not include the application elements that the COPS Office has designated to be critical will neither proceed to peer review nor receive further consideration. For this solicitation, the COPS Office has designated the following application elements as mandatory:

- Proposal Abstract (must be brief high-level project description that summarizes the proposed project in 500 words or less)
- Proposal Narrative (must be submitted as an attachment in the “Proposal Narrative” section).
- Application Questions (must respond to the application questions under the "Data Requested with Application" section. Please be advised there is a 250-word count limit for survey responses. (Note: review panels will not read any information past the 250-word count limit. Any information provided beyond the word limit will not be counted in your application.)
- Budget Narrative (must be submitted as an attachment in the “Budget/Financial Attachments” section)
- Budget Detail Worksheets (must use the web-based forms in “Budget and Associated Documentation” section)

- Timeline of project deliverables, milestones, activities and who will complete the activities. (must be submitted as an attachment in the "Additional Application Components" section)
- Résumés/Curricula Vitae of Key Personnel (must be submitted as an attachment in the "Additional Application Components" section)
- Letters of support, if applicable (must be submitted as an attachment in the "Additional Application Components" section - **Optional**)

Completing the Application for Federal Assistance (SF-424) and the Disclosure of Lobbying (SF-LLL) in Grants.gov

The SF-424 is a required standard form used as a cover sheet for submission of pre-applications, applications, and related information under discretionary programs. Applicants must complete and submit the SF-424 via <https://www.grants.gov> using the information provided on that site. Public reporting burden for this collection of information is estimated to average 60 minutes per response including time for reviewing instructions, searching existing data sources, gathering, and maintaining required data as well as completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0043), Washington, D.C. 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SUBMIT IT ONLINE VIA GRANTS.GOV.

Intergovernmental Review

Note: Intergovernmental Review (SF-424 Question 19): This solicitation is subject to Executive Order (E.O.) 12372, Intergovernmental Review of Federal Programs. Applicants must check the Office of Management and Budget's website for the names and addresses of Single Points of Contact (SPOC) under Intergovernmental Review: <https://www.whitehouse.gov/wp-content/uploads/2023/06/SPOC-list-as-of-2023.pdf>. If the applicant's state appears on the SPOC list, the applicant must contact the state SPOC to find out about, and comply with, the state's process under E.O. 12372. In completing the SF-424, such applicant is to make the appropriate selection in response to question 19 once the applicant has complied with its state E.O. 12372 process. An applicant whose state does not appear on the SPOC list should answer question 19 by selecting the following response: "Program is subject to E.O. 12372 but has not been selected by the state for review."

Disclosure of Lobbying Activities

All applicants must complete and submit the Disclosure of Lobbying Activities (SF-LLL) form in Grants.gov. Applicants that do not expend any funds for lobbying activities should enter “N/A” in the required highlighted fields. Applicants that expend any funds for lobbying activities must provide the information requested on the SF-LLL.

Once the SF-424 and SF-LLL have been submitted via Grants.gov, an email will be sent to the entity’s E-Business Point of Contact (E-Biz POC) (also referred to as the JustGrants Entity Administrator) from **DIAMD-NoReply@usdoj.gov**. This email will contain registration instructions to create an account in DOJ’s secure user management system, the Digital Identity and Access Management Directory (DIAMD), or instructions on how to complete the second part of the online application through the JustGrants website.

Standard Applicant Information

Applicants must complete the web-based form in JustGrants, which is pre-populated with the SF-424 data submitted in Grants.gov. Applicants are required to confirm the two Authorized Representatives, verify the legal name, address, and enter the ZIP code(s) for the areas affected by the project. For statewide or nationwide projects, the applicant should enter “State” or “National” in this field.

In order for applicants to complete this section, the two Authorized Representatives must have established accounts in JustGrants after the Grants.gov portion of the application is submitted. **Please note: Users assigned as Authorized Representatives must log in into the JustGrants system to activate their account. Users will not be visible in JustGrants until they have successfully logged into JustGrants.**

The Authorized Representatives are officials who have ultimate and final responsibility for all programmatic and financial decisions regarding this COPS Office application as representatives of your agency, as the legal recipient.

For guidance on who should be assigned as Authorized Representatives, please see below:

For law enforcement agencies, COPS Office awards require that both the top law enforcement executive (e.g., chief of police, sheriff, or equivalent) and the top government executive (e.g., mayor, board chairman, or equivalent) sign the application, and (if awarded funding) accept the award package. Both the top law enforcement executive and the top government executive must be assigned the role of Authorized Representative in Just Grants.

For non-law enforcement agencies, (institutions of higher education, school districts, private organizations, etc.), COPS Office awards require that both the programmatic official (e.g., executive director, chief executive officer, or equivalent) and financial official (e.g., chief financial officer, treasurer, or equivalent) sign the application, and (if awarded funding) accept the award package. These

two officials must have the ultimate signatory authority to sign contracts on behalf of your organization. Both the programmatic official and the financial official must be assigned the role of Authorized Representative in Just Grants.

Please note that nonexecutive positions (e.g., clerks, trustees) are not acceptable Authorized Representatives.

For further assistance with accessing JustGrants, please visit the [JustGrants website](#). For further assistance with submitting an application in JustGrants, please visit the [JustGrants Training web page](#).

Proposal Abstract

Applicants are required to write and submit a proposal abstract, which should be a brief high-level project description that summarizes the proposed project in 500 words or less. Project abstracts should explain to the reader about the projects' purpose, scope, activities, and key partners, if applicable. An abstract should be coherent, concise, and able to stand alone as a summary of the project. You should write your project abstract for a general public audience without any personally identifiable or law enforcement sensitive information as this abstract, along with other federal award information, may be published on publicly available governmentwide websites.

The abstract, which is to be entered into a text box in JustGrants, will not be scored but is used throughout the review process.

Data Requested with Application

Please refer to the following steps to help guide you through initiating, completing, modifying, and obtaining the status of solicitation surveys in the JustGrants system:

- To **initiate** a survey, please click on the **survey title** to open.
- When you have **completed** the survey, please click the **“Finish”** button on the lower right corner of the screen. The system will direct you to a review screen displaying your survey responses.
- To go back to the initial **list of surveys**, go to the **“Actions”** menu at the top right corner of the screen and select **“Close”** to exit the survey review screen. The survey you just completed will still display an **“Open”** status.
- To **confirm the completed status** of your survey, go back to the **“Actions”** menu and select **“Refresh.”** The status of your completed survey will change to **“Resolved-Completed.”**
- If you would like to **verify** the survey responses of a completed survey, you may click the **survey title** to reopen the selected survey and **view** your saved responses.

- If you would like to **change and/or update** the survey responses of a completed survey, you may click the **“Re-open”** option to **update** your saved responses.
- Remember, to **confirm the status** of a completed survey, you will need to click the **“Actions”** menu and **“Refresh.”**

A copy of the survey questions required for this solicitation can be found at <https://cops.usdoj.gov/saferoutcomes>.

Proposal Narrative

Applicants are required to submit a proposal narrative. The proposal narrative must respond to the solicitation and include the section headings listed in this section as well as describe how the project will advance community policing as it pertains to the chosen subcategory. Submit this narrative as an attachment under this section.

The narrative will be a significant factor in the application review and approval process. Failure to provide this information will eliminate your application from consideration.

The final application should include the following formatting requirements for application review:

- A cover page identifying the solicitation for which the applicant is applying and the title of the application.
- The proposal narrative should be no more than 20 pages long. (Note: review panels will not read any print past the 20-page mark. Any information provided in that space will not be counted in your application.)
Items counting toward the 20-page limit: Executive summaries, abstracts, timelines, graphs, and charts (regardless of pagination in front matter) will count toward overall page limit.
Items not counting toward the 20-page limit: Cover page, table of contents, and references (should be formatted as endnotes) will not count toward the overall page limit.
Appendices are strongly discouraged. Résumés, curricula vitae, letters of support from partners (if applicable), and certifications should be separate attachments and do not count towards the narrative page requirements.
- Double-spaced
- 8.5 x 11-inch pages
- One-inch margins
- Page numbers
- Type no smaller or larger than 12 point, Times New Roman font.
- Headings and subheadings that correspond to the sections identified in this section of the solicitation Microsoft Word documents in .doc or .docx formats or PDF files (.pdf)

Résumés, curricula vitae, letters of support from partners (if applicable), and certifications should be separate attachments and do not count toward the overall page count. If the project narrative fails to comply with these length-related restrictions, the COPS Office may consider such noncompliance in peer review and final award decisions. The COPS Office recommends numbering the pages as follows: “1 of 20,” “2 of 20,” etc.

Please format your narrative using the following section headings:

Cover page. Each application must have a cover page that includes the title of the application and identify the solicitation for which the applicant is applying.

Problem identification and project description. Applicants must clearly describe how this project is responsive to the solicitation. Applicants must provide a comprehensive, logical, and clear description of how each task will be implemented and completed. A clear description of deliverables, how deliverables respond to the solicitation, and how they will be feasibly developed, including content, process steps, and outcomes within the project parameters. Applicant describes a level of innovation or originality of the proposed project.

Project reach and impact. Applicants must explain why this project is necessary to address a gap in knowledge or practice. Applicants must include a description of a marketing plan for the deliverable(s) to ensure broad dissemination of the product(s) to the target audience(s), where applicable.

Management and implementation. Applicant must identify how strategy advances the goals and requirements of the solicitation. Applicant must include a project management plan that is aligned to solicitation goals and requirements. The project management plan clearly identifies project-specific risks and proposes methods for addressing risk and details quality control measures to ensure successful completion of the project and that are clearly linked to key processes and deliverables associated with the project. Project management plan should address any applicable consultation with community groups and appropriate private and public agencies in the implementation of the proposed initiative. Applicant should provide a detailed breakdown linking of key personnel to clearly defined roles, tasks, and deliverables that are supported by feasible timelines and align with the proposed budget, as well as limit unnecessary redundancies and makes efficient use of resources. Applicant must provide a detailed timeline with a list of key deliverables, activities, and milestones to take place within the award performance period (24 months for all awards under this solicitation), grouped by month or quarter.

Experience and capacity. Please detail the capacity of the agency or organization to carry out the proposed plan in the proposed time frame of the project and explain the agency’s or organization’s experience with other similar efforts. This must include a discussion of key staff, what roles they will play, their education and experience in similar projects, and their understanding of community policing and related subject matter expertise. Applicant should include résumés or vitae for key staff (up to three). Identify any key partnerships or stakeholders (community groups and/or private and public agencies) who will play a role in the implementation of this project and their responsibilities.

Applicants should not expect that application reviewers will infer such expertise from résumés or curricula vitae submitted as attachments. In addition, for all proposed in-person training, the applicant should identify the instructor(s), provide examples of the subject matter expertise and training experience of the instructor(s), and do so expressly within the project narrative. In addition, applicants should attach résumés or curricula vitae for all instructors.

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant]. Project Narrative.” Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats.

The COPS Office is providing a template for the project narrative that can be used as a voluntary tool to assist your organization in developing this required document. You will be able to access the template (Microsoft Word document) via the [How to Apply](#) page on the COPS Office website. Note that instructions in the templates are provided in italics. If you choose to use these templates, please make sure to delete the instructions before submitting so that they do not factor in your page count. If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.

Budget and Associated Documentation

Applicants must complete the web-based budget sheets in JustGrants and attach a separate budget narrative in the “Budget/Financial Attachments” section. The organization must create and attach a budget narrative that describes each item requested or group of similar items requested and links each item or group of items to the proposed project. All items will be reviewed on a case-by-case basis and in context of the allowable and unallowable costs lists. Budget narratives do not count toward the page limit of the proposal narrative.

Applicants must submit reasonable budgets based on the resources needed to implement their proposed projects. The budget should display a clear link between the specific project activities and the proposed budget items. It should not contain any items that are not detailed in the applicant's proposal.

The separate budget narrative should thoroughly and clearly describe every category of expense listed in the budget detail worksheets contained in this application. The COPS Office expects proposed budgets to be complete, cost effective, and allowable (e.g., reasonable, allocable, and necessary for project activities).

An applicant should demonstrate in its separate budget narrative how it will maximize cost effectiveness of award expenditures. Budget narratives should generally describe cost effectiveness in relation to potential alternatives and the goals of the project. For example, a budget narrative should detail why

planned in-person meetings are necessary, or how technology and collaboration with outside organizations could be used to reduce costs, without compromising quality. Consideration will be given to budget proposals that maximize the direct funding that supports project activities.

The budget narrative should be mathematically sound and correspond clearly with the information provided in the budget detail worksheets. The narrative should explain how the applicant estimated and calculated all costs and how those costs are necessary to the completion of the proposed project. The narrative may include tables for clarification purposes but need not be in a spreadsheet format. The budget should describe costs by year and should cover the full project period of two years.

In some circumstances, the budget and budget narrative will be reviewed separately from the applicant's proposal narrative. Therefore, it is very important that the budget narrative be as comprehensive as possible and describe in a narrative format each line item requested in the budget. The budget narrative should not be used to explain deliverables or project activities that are not included in the applicant's proposal narrative.

Deliverables and activities that are solely listed in the budget narrative and not described in the applicant's proposal narrative (and vice versa) will be scored negatively during the peer review process.

Applicants should submit projects that are scalable where appropriate. Note that the COPS Office may reduce funding for selected projects based on the number of awards selected. The COPS Office may revise the proposed scope and modify the associated budget proposal accordingly.

Each requested budget item must be allowable, necessary, allocable, and reasonable to the project activities.

Pre-agreement costs are costs incurred by the applicant prior to the start date of the period of performance of the federal award. Requests for reimbursement of items purchased or expenses incurred prior to the award start date will not be funded. All such costs incurred prior to award and prior to approval of the costs are incurred at the sole risk of the applicant. **NOTE: For awards made to states or units of local government (including law enforcement agencies), requests may be made only for items or positions that are not otherwise budgeted with state, local, or Bureau of Indian Affairs (BIA) funds and would not be funded in the absence of this COPS Office award (see award condition IV, "Nonsupplanting requirement").**

For-profit organizations (as well as other recipients) must forgo any profit or management fee.

Each of the categories that follows includes definitions as well as information on frequent requests as well as typically allowable and unallowable costs. The unallowable lists are not exhaustive and are generally considered unallowable for the entire solicitation, irrespective of where the applicant adds the requested item in the budget. **The COPS Office reserves the right to deny funding for any items that may not be included in this solicitation.**

The COPS Office is providing a template for the budget narrative that can be used as a voluntary tool to assist your organization in developing this required document. You will be able to access the template (Microsoft Word document) in the FY24 Resource Guide for Community Policing Advancement (CPA) Programs located at [How to Apply](#) web page. Note that instructions in the template are provided in italics. If you choose to use this template, please make sure to delete the instructions before submitting so that they do not factor in your page count. In addition, the COPS Office is providing an example budget narrative, which can also be found in the FY24 Resource Guide for Community Policing Advancement (CPA) Programs.

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant]. Budget Narrative.”

Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats.

Budget Worksheet and Budget Narrative (Web-based Form)

Budget requests may be made in the following categories:

- Civilian personnel (base salary and fringe benefits)
- Travel
- Equipment
- Supplies
- Sub-awards
- Procurement contracts
- Other costs
- Indirect costs

Allowable Costs

All items requested will be considered on a case-by-case basis during the budget review process. Items under the program must be purchased using the guidelines established by the appropriations legislation that governs this funding. In addition, each item requested must programmatically link to the activities described in your application. To the extent permitted by law and practicable under a federal award, recipients and subrecipients must provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. See 2 C.F.R. § 200.322.

For each request, applicants must complete the web-based budget form. The cost should be broken down to the lowest form.

The “additional narrative” section should be used to describe and justify why the item is necessary for the success of the project. Provide any additional calculations that make up the base cost.

Allowable Civilian Personnel

For Civilian/non-sworn positions

Salaries of personnel are costs based on the percentage of time spent (full time equivalent [FTE]) working directly on the project. The total salary percentage should be comparable and consistent with organizational policy. The total amount paid is comparable to industry standards and the type of work being performed.

A recipient may not use federal funds to pay total cash compensation to any employee of the recipient at a rate that exceeds 110 percent of the maximum annual salary payable to a member of the Federal Government’s Senior Executive Service (SES) at an organization with a Certified SES Performance Appraisal System for that year. The salary table for SES employees is available at the Office of Personnel Management website: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>. Note: A recipient may compensate an employee at a greater rate, provided the amount in excess of this compensation limitation is paid with nonfederal funds. (Nonfederal funds used for any such additional compensation will not be considered matching funds.) If only a portion of an employee’s time is charged to a COPS Office award, the maximum allowable compensation is equal to the percentage of time worked times the maximum salary limitation.

For each civilian personnel request, applicants must complete the web-based form. If the individual will be working more than one year on the project, applicants will have the option to copy a year.

The “additional narrative” section should be used to describe the employee’s roles, responsibilities, and activities related to the work to be completed on the project. If the salary increases from one budget year to another because of cost of living increases, be sure to detail these increases in the budget description.

Additional documentation that may need to be uploaded in the “Budget/Financial Attachments” section includes the following:

- Job description
- Organizational pay scales or written annual salary per position
- Résumés/vitae

Completing civilian base salary

If you are not requesting any civilian base salary, move to the next section.

Allowable Fringe Benefits

For Civilian/non-sworn positions

Fringe benefits are allowances and services provided by the organization to its employees as compensation in addition to regular salary. Fringe benefits should be based on actual known costs or an established formula. Typical fringe benefits include the following:

- Federal Insurance Contributions Act (FICA) taxes—includes Social Security and Medicare and cannot exceed 7.65 percent (6.2 and 1.45 percent respectively)
- Health insurance—individual or family
- Life insurance
- Vacation
- Sick leave
- Retirement
- State unemployment compensation insurance
- Federal unemployment tax
- Worker’s Compensation insurance
- Other fringe benefits may include holidays, military leave, bereavement leave, sabbatical leave, severance pay, jury duty, state disability insurance, pension plan, 401(k) plan

Applicants will need to provide the appropriate percentage for each fringe benefit that the individual is allocated per the employee benefits. Note, the system will not allow more than 6.2% for Social Security and 1.45% for Medicare.

Additional documentation that may need to be uploaded in the “Budget/Financial Attachments” section includes the following:

- Written organization policies regarding fringe benefits
- Organizational fringe rate agreement

Completing fringe benefits

If you are not requesting any civilian base salary, move to the next section.

Allowable Travel

Travel costs include the costs of transportation, lodging, meals, temporary dependent care, and incidental expenses incurred by personnel while on official business, such as attendance at an award-related meeting or conference when travel is further than 50 miles from program location. Travel and

subsistence estimates are based on the contemplated number of trips, places to be visited, length of stay, transportation costs, subsistence allowances, and the recipient's own travel policies. For additional guidance, please see the Uniform Guidance 2 C.F.R. § 200.475.

When charging travel costs to federal awards, award recipients must indicate the source of travel policies applied (applicant or federal travel regulations). If a recipient does not have a written travel policy, it must adhere to the Federal Travel Regulations (FTR). For information on the FTR and U.S. Government General Service Administration (GSA) per diem rates by geographic area, please visit <https://www.gsa.gov/travel/plan-book/per-diem-rates>. For all applicants (with or without a written travel policy), airfare travel costs must be one of the following: the lowest discount commercial airfare, standard coach airfare, or the Federal Government contract airfare (if authorized and available).

Temporary dependent care costs above and beyond regular dependent care that directly results from conference travels are allowable as long as the costs incurred (1) are a direct result of the individual's travel for the federal award; (2) are consistent with the recipient's documented travel policy for all entity travel; and (3) are only temporary during the travel period.

The only individuals traveling who should be charged in this section are those listed in "Civilian personnel." All other individuals traveling for the project, including participant and consultant travel, should be listed under "Sub-awards" or "Procurement Contracts." This section should also include any training costs for the primary applicant, all other training costs should be listed under "Sub-Awards," "Procurement Contracts," or "Other Costs" as appropriate.

For each travel request, applicants must complete the web-based form. Each trip should be entered as an individual entry rather than a group of trips.

The "additional narrative" section should be used to describe the purpose of the trip, proposed destination, trip duration by day/night, and list of individuals traveling as well as a detailed cost breakdown for each travel category (lodging, per diem, etc.). The cost breakdown should include

- mode of transportation and proposed fare per trip (airfare, train, etc.) broken down by day;
- mileage allowances if private vehicle will be used;
- per diem rates for the destination per day (including full per diem and travel day per diem);
- lodging costs per night;
- transportation fees per day;
- parking fees per day.

Additional documentation that may need to be uploaded in the "Budget/Financial Attachments" section includes the following:

- Organizational travel policy

Completing Travel

If you are not requesting any travel, training, or conferences, move to the next section.

Allowable Equipment

Necessary equipment must be specifically purchased to implement or enhance the proposed project. Equipment is tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds \$5,000. Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high-cost items and those subject to rapid technical advances. Rented or leased equipment costs should be listed in “Procurement Contracts.”

All equipment items must be clearly linked to the enhancement or implementation of the project. For each equipment request, applicants must complete the web-based form.

The “additional narrative” section should be used to describe the type of equipment with a description and justification explaining why the equipment is necessary for the success of the project. The description should provide any additional calculations that make up the base cost and the justification should explain that this equipment is not available or accessible to project personnel without specifically purchasing through this award.

Additional documentation that may need to be uploaded in the “Budget/Financial Attachments” section includes the following:

- Narrative of the procurement method
- Sole Source Justification (see the Sole Source Justification fact sheet for further guidance)

Completing Equipment

If you are not requesting any equipment move to the next section.

Allowable Supplies

Supplies means all tangible personal property other than those items described under “Equipment.” Supplies costs consist of those incurred for purchased goods and fabricated parts directly related to an award proposal. Supplies differ from equipment in that they are consumable, expendable, and of a relatively low unit cost, defined as less than \$5,000 per unit. Such costs may include paper, printer ink, pens, pencils, laptops, etc. A computing device is a supply if the acquisition cost is less than \$5,000, regardless of the length of its useful life.

For broad category requests (such as “office supplies”), explanation for project amounts should be provided with calculations. Broad grouping of items under supplies will be limited to \$50 per month; otherwise items must be individually captured and justified in the budget request.

For any training awards, the COPS Office allows the purchase of flash drives or USB devices to distribute training materials with approval prior to purchasing.

All supply items must be clearly linked to the enhancement or implementation of the project. Examples of such items may include the following:

- Flash drives
- General office supplies (printer toner, paper, pens, binders, notepads, etc.)
- Shipping
- Training manuals/materials
- USB devices to distribute raining materials
- Marketing materials
- Laptops (A computing device is a supply if the acquisition cost is less than \$5,000, regardless of the length of its useful life)

For each supply request, applicants must complete the web-based form. The cost should be broken down to the lowest form; therefore, if you are requesting \$30 per month for office supplies, the calculation should be 12 x \$30 and not 1 x \$360.

The “additional narrative” section should be used to describe and justify why the supplies are necessary for the success of the project. Provide any additional calculations that make up the base cost.

Completing Supplies

If you are not requesting any supplies, move to the next section.

Allowable Sub-awards

The applicant should distinguish clearly between sub-awards and procurement contracts in allocating any funds to other entities. Pursuant to 2 C.F.R. § 200.1, a sub-award is for the purpose of carrying out a portion of the federal award, and a contract is for the purpose of purchasing goods and services needed to carry out the program or project under the federal award. The substance of the relationship is more important than the form of the agreement in determining whether the recipient of the pass-through funds is a subrecipient or a contractor. The same allowable and unallowable costs that apply to the federal award apply to sub-awards.

Any recipient of an award will be responsible for monitoring sub-awards and contracts in accordance with all applicable statutes, regulations, and guidelines. Primary recipients will be responsible for oversight of subrecipient spending and monitoring specific performance measures and outcomes attributable to the use of COPS Office funds. The recipient will ensure that the award terms and conditions flow down to its subrecipients including all applicable uniform administrative requirements, cost principles, and audit requirements. The recipient will also ensure that subrecipients maintain

effective control and accountability over all funds, property, and other assets covered by subawards and that each subrecipient establishes and uses internal fiscal and program management procedures sufficient to prevent fraud, waste, or abuse.

Completing Sub-awards

If you are not requesting any sub-award costs, move to the next section.

Allowable Procurement Contracts

The applicant should distinguish clearly between sub-awards and procurement contracts in allocating any funds to other entities. Pursuant to 2 C.F.R. § 200.1, a sub-award is for the purpose of carrying out a portion of the federal award, and a contract is for the purpose of purchasing goods and services needed to carry out the program or project under the federal award. Contracts must directly contribute to the implementation or enhancement of the project. The substance of the relationship is more important than the form of the agreement in determining whether the recipient of the pass-through funds is a subrecipient or a contractor. The same allowable and unallowable costs that apply to the federal award apply to sub-awards. Keep in mind that the awarding and monitoring of contracts must follow documented procurement procedures, including full and open competition, pursuant to the procurement standards in 2 C.F.R. §§ 200.317– 200.327, and the issuance of sub-awards must meet the requirements of 2 C.F.R. § 200.331.

Consultant expenses include the procurement of goods or services that directly contribute to the implementation or enhancement of the project. The use of a consultant should be more economical than direct employment. Compensation for individual consultant services procured under a COPS Office award must be reasonable and allocable in accordance with Office of Management and Budget (OMB) cost principles, and consistent with that paid for similar services in the marketplace. The services should be commensurate with the rate or salary paid by the primary employer.

Unless otherwise approved by the COPS Office, independent consultant rates will be approved based on the salary a consultant receives from his or her primary employer, as applicable, up to \$650 per day (or \$81.25 per hour). Please note that this does not mean that the rate can or should be as high as \$650 for all consultants. If individuals receive fringe benefits from their primary employer, such fringe benefit costs should not be included in the calculation of consultant rates. A consultant rate justification will need to be submitted for review and approval to the COPS Office for any consultants paid more than \$650 per day prior to incurring any costs. Determinations of approval will be made on a case-by-case basis.

Consultant travel costs follow the same guidelines as “Travel” but should be costs associated with consultant travel. These costs should not be reflected in the “Civilian personnel” or “Travel” categories.

All sole source procurements of goods and services (those not awarded competitively) in excess of the simplified acquisition threshold amount (currently \$250,000) require prior approval from the COPS Office.

All other consultant-related expenses should be included in this section such as supply and equipment requests. The same guidelines as previously stated in the above sections will apply.

All procurement contracts must be clearly linked to the enhancement or implementation of the project. Examples may include the following:

- Training instructor fees and travel

For each procurement contract request, applicants must complete the web-based form.

The “additional narrative” section should be used to describe and justify the product or services to be procured by sub-award including the nature and scope of goods purchased, price proposals, and length of contract. Procurement contract travel requests should follow the same guidance as the “travel” section. Provide any additional calculations that make up the base cost.

Additional documentation that may need to be uploaded in the “Budget/Financial Attachments” section includes the following:

- Consultant Rate Justification (see the Consultant Rate Justification fact sheet for further guidance)
- Consultant résumés/vitae
- Organizational travel policy
- Sole Source Justification (see the Sole Source Justification fact sheet for further guidance)

Completing Procurement Contracts

If you are not requesting any procurement contract costs, move to the next section.

Allowable Other Costs

Items not included in the previous categories but that have a direct correlation to the overall success of a recipient’s project objectives and are necessary for the project to reach full implementation will be considered on a case-by-case basis by the COPS Office. Requests that may fall under the “other” category include:

- Rent (see next paragraph for more details)
- Associated conference and training to market and stay up to date on best practices
- Program administrative software
- Sworn officer overtime
- Sworn officer overtime fringe benefits for FICA, worker’s compensation, and unemployment compensation
- Software purchases (such as training, webinar or platform software. Software purchases will only be funded for the project period)

Rental costs are generally allowable under this solicitation when the costs are not included in indirect costs. Applicants should list square footage cost in the budget. The amount must be based on the space that will be allocated to implement the COPS Office project, not the costs of the entire rental space.

If an applicant proposes a program or activity that would deliver services or benefits to individuals, the costs of taking reasonable steps to provide meaningful access to those services or benefits for individuals with limited English proficiency may be allowable. Reasonable steps to provide meaningful access to services or benefits may include interpretation or translation services, where appropriate. For additional information, see the “Civil Rights.”

For applicants that anticipate using COPS Office funds to cover only a portion of a particular service they provide, the budget should prorate operational costs like rent and phone service accordingly.

Completing Other Costs

If you are not requesting any other costs, move to the next section.

Indirect Costs

Overview of indirect costs

Indirect costs means those costs incurred for a common or joint purpose benefiting more than one cost objective and not readily assignable to a particular project but necessary to the operation of the organization and the performance of the project.

Examples of costs usually treated as indirect include those incurred for facility operation and maintenance, depreciation, and administrative salaries.

If a cognizant federal agency has approved your negotiated indirect cost rate, the negotiated rate must be accepted by all federal awarding agencies, unless otherwise capped by federal statute or regulation.

Indirect cost rates may vary depending on your cognizant federal agency determinations. In some cases, project budgets may include more than one rate, particularly when offsite activity is conducted at a location other than the organizations premises. Note: Ensure the indirect calculation is in accordance with your organization’s indirect cost rate agreement.

Expired indirect cost rate agreement

If your indirect cost rate agreement has expired, you should either renegotiate the rate or request a one-time extension from your cognizant agency. The negotiated cost rate may be extended for up to four years. Once the cognizant federal agency has approved your extension, you must abide by the rate for the agreed-upon time period. No further negotiations regarding indirect cost rates may occur until the extension has expired. At the end of the extension period, you must then negotiate a new indirect cost rate.

De minimis indirect cost rate

If you do not have a current negotiated or provisional indirect cost rate, except for those nonfederal entities described in 2 C.F.R. Part 200, Appendix VII to Part 200, paragraph D.1.b., you may elect to charge a de minimis rate of 10 percent of modified total direct costs (MTDC) which may be used indefinitely. When using this method, cost must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both. Also, if this method is chosen, then it must be used consistently for all federal awards until such time as you choose to negotiate an indirect cost rate (which may be done at any time). No documentation is required to justify the 10 percent de minimis indirect cost rate. See 2 C.F.R. § 200.414(f).

If you elect to negotiate an indirect cost rate with your cognizant federal agency, a special condition will be added to the award prohibiting the obligation, expenditure, or drawdown of funds reimbursement for indirect costs until an indirect cost rate has been approved by your cognizant federal agency, and the appropriate notification has been made retiring the special condition.

For assistance with identifying the appropriate cognizant federal agency for indirect costs, please contact the OCFO Customer Service Center at 800-458-0786 or at ask.ocfo@usdoj.gov. If DOJ is the cognizant federal agency, applicants may obtain information needed to submit an indirect cost rate proposal at <https://www.ojp.gov/funding/Apply/Resources/IndirectCosts.pdf>.

Exception: If you are a unit of local government in which the Office of Management and Budget (OMB) has not assigned a cognizant federal agency, then you are not required to submit your indirect cost proposal, unless the awarding agency requires a copy of the proposal. Please see the appropriate appendix section in 2 C.F.R. Part 200 as listed above.

Approval of indirect cost rates for subrecipients

As the direct recipient, you are responsible for approving indirect cost rates for your subrecipients if funded. Such rates must be consistent with the requirements of 2 C.F.R. Part 200. The COPS Office will not approve indirect cost rates beyond the direct recipient level; however, subrecipients who are also direct recipients of federal awards may already have a federally approved indirect cost rate. If your subrecipient has negotiated an indirect cost rate with the Federal Government, then that rate applies.

The subrecipient rates should not be included in this section, but rather under the “Sub-awards” or “Procurement Contracts” sections.

Calculating direct cost base

The following direct cost bases may be used as a distribution base:

- **Modified total direct cost (MTDC)**—This base includes all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency.
- **Direct salaries and wages**—This base includes only the costs of direct salaries and wages incurred by the organization.
- **Direct salaries and wages plus fringe benefits**—This base includes the costs of direct salary, wages and fringe benefits incurred by the organization.

Exclusions in direct cost bases

Applicants should pay particular attention to the two areas listed below to ensure that their indirect cost rate application is in compliance with the existing requirements of the government-wide award rules set out in the Office of Management and Budget (OMB) circular and regulations:

- **\$25,000 Subcontract/Subaward limitation.** For institutions of higher education and nonprofit organizations, indirect cost rates negotiated on the basis of modified total direct costs may only be applied against the first \$25,000 of any subcontract or subaward under the agreement. This limitation must be applied to all conference related subcontracts and subawards, including those with hotels and travel agents. (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. § 200.400 et seq.)
- **Participant support costs.** For nonprofit organizations, in accordance with 2 C.F.R. part 200, Appendix IV to 2 Part 200, paragraph B.2.c.—Indirect (F&A) Costs Identification and Assignment and Rate Determination for Nonprofit Organizations: “The distribution base may be total direct costs (excluding capital expenditures and other distorting items, such as [contracts or] subawards for \$25,000 or more), direct salaries and wages, or other base which results in an equitable distribution. The distribution base must exclude participant support costs as defined in § 200.1. Participant support costs.”

Please note that only employees of the nonprofit organization are excluded from the definition of participant support costs. Costs related to contractors of the nonprofit organization who are acting in the capacity of a conference trainer/instructor/presenter/facilitator are considered participant support costs. For more information on allowable costs for conferences and training, please visit

https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf.

If you need additional information on an indirect cost rate negotiated agreement, go to the DOJ Grants Financial Guide at <https://ojp.gov/financialguide/doj/index.htm>.

The “additional narrative” section should be used to describe the breakdown of the calculation as well as provide any additional calculations that make up the base cost. Include the expiration date and the cognizant agency name.

Additional documentation that may need to be uploaded in the “Budget/Financial Attachments” section includes the following:

- Current, signed, federally approved indirect cost rate negotiated agreement
 - If your organization does not have a provisional or current indirect cost rate negotiated agreement or it is expired and under review, the applicant must submit supporting documents to show the applicant’s cognizant federal agency is reviewing the request. The COPS Office may disallow or freeze access to indirect funds until a provisional or current indirect cost rate negotiated agreement is provided.

Ensure that each type of indirect cost rate (provisional, final, predetermined, fixed, etc.) is identified. For institutions of higher education and other institutions where multiple indirect rates are applied, please enter each indirect rate as a separate line item with calculation breakdown and description for which each rate applies.

Unallowable Costs: Requests will not be funded

There are no allowable costs in this section. For allowable costs, please see the “Allowable Costs” section above. The items listed in this section are generally considered unallowable and are rarely approved by the COPS Office. Before including any of these items in your budget and application, please contact the COPS Office at AskCopsRC@usdoj.gov. This is not an exhaustive unallowable costs list, and items not listed below will be reviewed on a case-by-case basis. The COPS Office reserves the right to deny funding for items not included on this unallowable cost list. Requests for reimbursement of items purchased, expenses incurred, or individuals hired prior to the award start date will not be funded.

Unallowable Civilian personnel (base salary and fringe benefits)

Base salary

Typically, unallowable civilian personnel costs include, but are not limited to, the following (Note: these are typically unallowable no matter which category they are placed under):

- If your organization charges an indirect cost, those costs normally include the following positions and therefore these positions should not be charged as personnel costs to avoid possible duplication:
 - Administration (e.g., director or program head)
 - Clerical (e.g., secretary or administrative assistant)

- Accounting (e.g., controller or bookkeeper)
- Procurement (e.g., purchasing director or stockroom clerk)
- Housekeeping and maintenance (e.g., custodial and janitorial, repairman, or grounds keeper)

NOTE: These positions can be charged directly if the individual is working a significant amount of time on the project. This will be approved on a case-by-case basis and your narrative should significantly articulate the need to charge these directly if applicable.

- For awards made to states or units of local government (including law enforcement agencies), salaries and benefits for positions (including exempt employees) that are already budgeted with state, local, or Bureau of Indian Affairs (BIA) funds and would be funded in the absence of this COPS Office award are also not allowed.
- Salaries and benefits of personnel that do not work directly on the project.
- Salaries and benefits for contract or consultant personnel (these should be placed under “Sub-awards” or “Procurement Contracts,” as applicable).

Unallowable Fringe benefits

Typically, unallowable fringe benefit costs include, but are not limited to, the following (Note: these are typically unallowable no matter which category they are placed under):

- Bonuses or commissions
- If your indirect cost rate agreement includes fringe benefits, you may not charge these costs directly to the project

Other Unallowable Items

- 3D printers and associated equipment
- Activities run by organizations whose primary focus is Performance Training / Peak Performance Training / Athletic Performance
- Advertising and public relations designed solely to promote the recipient
- Ammunition (live and training)
- Audit requirements are unallowable (if the applicant organization did not meet the applicable expenditure threshold during the organization’s fiscal year, the cost of any audit performed may not be charged to the award)
- Bar charges/alcoholic beverages
- Bayonets
- Bikes and associated equipment
- Biometric technology

- Body armor
- Body metric equipment such as blood pressure monitors and FitBits
- Body-worn cameras
- Bomb detection technology
- Bulletproof vests and accessories
- Buses/shuttles/transit vans (purchasing or leasing)
- Camouflage uniforms
- Certification to become a Personal Trainer
- Closed-circuit televisions (CCTV)
- Communication boxes
- Commuting costs including to and from program location
- Compensation of federal employees (this category of unallowable costs includes salary payments, consulting fees, or other compensation to full-time federal employees)
- Computer aided dispatch (CAD) systems/records management systems (RMS)
- Conference exhibit displays such as backdrops and retractable banners
- Conference or event swag, including t-shirts, bags, or mugs
- Construction costs
- Copiers
- Corporate formation (startup costs)
- Costs exceeding Federal Travel Regulations if no other organizational written policy is supplied that supersedes these established rates
- Costs for audits not required or performed in accordance with the Office of Management and Budget (OMB) Circular A-133 or 2 C.F.R. Part 200 Subpart F – Audit Requirement are unallowable. If the applicant organization did not meet the applicable expenditure threshold during the organization’s fiscal year, the cost of any audit performed may not be charged to the award
- Costs incurred for intramural activities, student publications, student clubs, and other student activities
- COVID-19 test kits
- Credit card fees
- Criminal intelligence systems

- Dietician/nutritionist
- Displays, demonstrations, or exhibits
- Electronic control weapons (ECW)/Tasers
- Entertainment, including amusement, diversion, social activities, and any associated costs (e.g., tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities)
- Equipment with a physical wellness focus (saunas, cold plunges)
- Explosives
- Extracurricular expenses for youth programs, including t-shirts, meal plans, giveaways, swag bags, and games
- Firearm investigation equipment
- Firearms (including training firearms)
- Fitness equipment (including yoga equipment)
- Floor and wall mats/pads
- Food and beverages at conferences, meetings, or trainings your organization is hosting
- Foreign travel
- Fuel for general patrol vehicles
- General law enforcement vehicles, including patrol cars and leased vehicles (for purposes of the CPD CIT program, purchase and leasing of non-patrol vehicles is allowable)
- Golf carts/motorized personal vehicles
- GPS and Easy Pass rentals (when renting a car)
- GPS devices
- Grenade launchers
- Gunshot detection equipment and technology
- Gym memberships and subscriptions
- Handcuffs, weapons, and ammunition (including training ammunition)
- Health screenings
- Land acquisition including renting, leasing, or construction of buildings or other physical facilities
- Laser spectroscopy devices
- Laundry services while on travel
- License plate readers (LPR) and associated software

- Live animals (including dogs and horses) including associated supplies, food, transportation, and veterinary expenses
- Local travel costs (lodging, meals, per diem, or transportation costs) within a 50-mile radius of the project location
- Maintenance and enhancements (such as mounts) of patrol vehicles (for purposes of the CPD CIT program, maintenance of non-patrol vehicle purchased or leased under CIT funding is allowable)
- Maintenance and/or service contracts that extend the life of the award period (multiyear contracts and extended warranties are allowable but must be paid in full within the initial award period and must not exceed the award period)
- Manned aircraft
- Martial arts training
- Massages
- Membership fees to organizations whose primary activity is lobbying
- Metal detectors
- Mileage reimbursement, rental cars, parking fees, and/or taxi fare for local travel within a 50-mile radius of the project location
- Militarized equipment
- Mobile data terminals (MDT)
- Narcan
- Non-motorized vehicles
- Office rental/lease space, except for costs proportionate to work conducted under this solicitation (if included within an indirect cost rate negotiated agreement)
- Paying for meals other than your own
- Personal protective equipment or gear
- Promotional items and memorabilia, including challenge coins, models, gifts, and souvenirs
- Psychological screenings
- Publishing services (the COPS Office provides editing, graphic design, and printing services for deliverables and other project materials; therefore, these costs cannot be directly charged unless approved on a case-by-case basis)
- Radios for law enforcement (for purposes of the CIT program, radios to be used by behavioral/mental health providers are allowable)
- Recreation equipment (including tents and coolers)

- Recreational supplies (such as Frisbees)
- Rental costs are not allowable for property owned by the applicant or if the applicant has a financial interest in the property. In this case only the costs of ownership, including maintenance costs, insurance, depreciation, utilities, etc., are allowable costs. The applicant must indicate in the budget narrative whether or not they own the space that will be rented.
- Robotic cameras
- Scholarships, fellowships, and other programs for student aid (exceptions are for institutions for higher education)
- Servers
- Shared items between projects—if supplies or equipment is to be used for concurrent projects, this should be captured in your indirect costs. If your organization does not have an indirect cost rate agreement, this may be proportionally charged as direct with prior approval.
- Simulators/augmented reality programs
- Sleep pods
- Surveillance equipment
- Sworn officer salaries and fringe benefits (except sworn overtime and related overtime FICA, worker’s compensation, and unemployment compensation fringe benefits – see allowable other costs section above)
- Tactical gear
- Thermal imaging devices
- Tips/gratuities
- Tracked (armored) vehicles
- Traffic equipment (such as cones, message boards)
- Trailers
- Trophies, medals, certificates, and other awards
- Unmanned aerial vehicles (drones)
- Video surveillance (including security systems)
- Uniforms (including helmets, boots)
- Weaponized aircraft, vessels, and vehicles of any kind

Consolidated Category Summary

You will be able to review the category totals and the total project costs under this section. To make any changes to a particular category, please use the navigation on the right of the screen.

Noncompetitive Justification

As applicable, applicants will attach the noncompetitive justification (or sole source justification). Additional guidance can be found in the [Sole Source Justification fact sheet](#).

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant].Noncompetitive.” Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. **If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.**

Indirect Cost Rate Agreement (if applicable)

As applicable, applicants will attach the indirect cost rate agreement. Additional guidance can be found in the [Indirect Cost Rate Agreement fact sheet](#).

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant].Indirect Costs.”

Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.

Consultant Rate

As applicable, applicants will attach the consultant rate justification. Additional guidance can be found in the [Consultant Rate Justification fact sheet](#).

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant].Consultant Rate.”

Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.

Budget Narrative

Applicants must attach a separate budget narrative. The organization must create and attach a budget narrative that describes each item requested or group of similar items requested and links each item or group of items to the proposed project. All items will be reviewed on a case-by-case basis and in context of the allowable and unallowable costs lists. Budget narratives do not count toward the page limit of the proposal narrative.

Applicants must submit reasonable budgets based on the resources needed to implement their proposed projects. The budget should display a clear link between the specific project activities and the proposed budget items. It should not contain any items that are not detailed in the applicant's proposal narrative.

The separate budget narrative should thoroughly and clearly describe every category of expense listed in the budget detail worksheets contained in this application. The COPS Office expects proposed budgets to be complete, cost effective, and allowable (e.g., reasonable, allocable, and necessary for project activities).

An applicant should demonstrate in its separate budget narrative how it will maximize cost effectiveness of award expenditures. Budget narratives should generally describe cost effectiveness in relation to potential alternatives and the goals of the project. For example, a budget narrative should detail why planned in-person meetings are necessary, or how technology and collaboration with outside organizations could be used to reduce costs, without compromising quality. Consideration will be given to budget proposals that maximize the direct funding that supports project activities.

The budget narrative should be mathematically sound and correspond clearly with the information provided in the budget detail worksheets. The narrative should explain how the applicant estimated and calculated all costs and how those costs are necessary to the completion of the proposed project. The narrative may include tables for clarification purposes but need not be in a spreadsheet format. The budget should describe costs by year and should cover the full project period of two years.

In some circumstances, the budget and budget narrative will be reviewed separately from the applicant's proposal narrative. Therefore, it is very important that the budget narrative be as comprehensive as possible and describe in a narrative format each line item requested in the budget. The budget narrative should not be used to explain deliverables or project activities that are not included in the applicant's proposal narrative.

Deliverables and activities that are solely listed in the budget narrative and not described in the applicant's proposal narrative (and vice versa) will be scored negatively during the peer review process.

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant]. Sole Source.” Recommended file formats

are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. **If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.**

Memoranda of Understanding (MOU) and Other Supportive Documents

As applicable, applicants will attach the any memoranda of understanding or partner agreements in this section.

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant].MOU.” Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. **If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.**

Additional Application Components

As applicable, applicants will attach the following additional application attachments in this section:

- Curriculum Vitae or résumés (up to three key project staff detailing work and educational history and highlighting any experience that is relevant to their ability to successfully carry out the proposed project)
- Timeline of project deliverables, milestones, activities and who will complete the activities
- Letters of Support

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant].Resume.” Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. **If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.**

Curricula Vitae or Résumés

As applicable, applicants will attach the Curriculum Vitae or résumés for up to three key project staff detailing work and educational history and highlighting any experience that is relevant to their ability to successfully carry out the proposed project).

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant].Resume.” Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. **If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.**

Letters of Support

As applicable, applicants will attach letters of support.

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant].Support.” Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. **If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.**

Timeline Form

Applicants must attach a separate timeline of project deliverables, which are mapped to the goals and objectives of the proposed initiative, and include milestones, activities and who will complete the activities. The timeline attachment should be uploaded in the “Additional Application Components” section of this application. If awarded funding, the information provided in the timeline attachment will be used in performance reporting and recipients will have to provide a status on the goals, objectives, deliverables, timeline. The COPS Office encourages applicants to review and link their goals and objectives to the solicitation goals and requirements.

The COPS Office strongly recommends that uploaded files be clearly named to indicate the applicant organization name and the file contents to ensure that reviewers can easily locate application documents. All other attachments—such as letters of support and résumés—should use descriptive file names identified on the attachment(s) such as “[Applicant].Timeline.” Recommended file formats are PDF, Microsoft Word, and Microsoft Excel. The system may reject applications with other formats. **If an applicant submits multiple versions of the same document, the COPS Office will review only the most recent system-validated version submitted.**

Disclosures and Assurances

Disclosure of Lobbying Activities

Important: All applicants must complete the SF-LLL Disclosure of Lobbying Activities in Grants.gov prior to beginning the application process in JustGrants. NOTE: Applicants that do not expend any funds for lobbying activities should enter “N/A” in the required highlighted fields.

This disclosure form shall be completed by the reporting entity, whether sub-awardee or prime federal recipient, at the initiation or receipt of a covered federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. § 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity 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 a covered federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

If this applies to your organization, you are required to complete the disclosure form via grants.gov. If you need to submit additional forms, please submit them as attachments to your application online in the “Additional Application Components” Section.

DOJ Certified Standard Assurances

Applicants to COPS Office programs are required to sign and acknowledge the standard DOJ Assurances form in JustGrants. Signing this document assures the COPS Office that you have read, understood, and accepted the award terms and conditions as outlined in the Assurances. Please read this document carefully, as signatures on this document are treated as material representation of fact upon which reliance will be placed when the U.S. Department of Justice determines to fund the covered award. Full text of the Certified Standard Assurances and Terms and Conditions is available in the FY24 Resource Guide for Community Policing Advancement (CPA) Programs at https://cops.usdoj.gov/pdf/2024ProgramDocs/CPA_Resource_Guide.pdf.

DOJ Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; Drug-Free Workplace Requirements; Law Enforcement and Community Policing

Applicants to COPS Office programs are required to sign and acknowledge the standard DOJ Certifications form in JustGrants. Signing this document assures the COPS Office that you have read, understood, and accepted the award terms and conditions as outlined in the Certifications.

Please read this document carefully, as signatures on this document are treated as material representation of fact upon which reliance will be placed when the U.S. Department of Justice determines to award the covered award. See appendices for the full assurances and certifications, which can all be found in the [FY24 Resource Guide for Community Policing Advancement \(CPA\) Programs](#).

An explanation is required when the applicant is unable to certify to certain statements in the “Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; Drug-Free Workplace Requirements; Law Enforcement and Community Policing” form (if applicable). When the applicant is unable to certify to specific statements identified in this Certifications form, the applicant must attach an explanation. The applicant is still required to sign the Certifications form to certify to all the other applicable statements. Please see the [FY24 Resource Guide for Community Policing Advancement \(CPA\) Programs](#) for a copy of this Certifications form.

The certifications are as follows:

1. The applicant understands that, as a general rule, COPS Office funding may not be used for the same item or service funded through another funding source, and
2. The applicant and any required or identified official partner(s) listed in this application mutually agreed to this partnership prior to submission.

Declaration and Certification to DOJ as to Application Submission

Applicants must read and acknowledge the statements in the Declaration and Certification.

Federal Civil Rights and Award Review

Please be advised that an application may not be funded and, if awarded, a hold may be placed on the award if it is deemed that the applicant is not in compliance with federal civil rights laws, is not cooperating with an ongoing federal civil rights investigation, or is not cooperating with a U.S. Department of Justice award review or audit.

How to Apply

Federal regulations require that an applicant for federal funding (1) be registered in SAM before submitting its application, (2) provide a valid unique entity identifier in its application, and (3) continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by a federal awarding agency. The COPS Office may not make an award to an applicant until the applicant has complied with all applicable Unique Entity Identifier (UEI) and SAM requirements and, if an applicant has not fully complied with these requirements by the time the COPS Office is ready to make an award, the COPS Office may determine that the applicant is not qualified to receive an award. See 2 C.F.R. §§ 25.200 and 25.205 and the Award Terms and Conditions for further information.

Please follow the steps listed here to ensure your application is submitted by the deadline for this solicitation. Applicants should register online with SAM and with Grants.gov well in advance of the JustGrants deadline.

Step 1: Register with SAM database/Confirm Unique Entity Identifier (UEI) number

The Unique Entity Identifier (UEI) issued by SAM is a 12-character alphanumeric value and, once issued, will not change. Entities that are currently registered in SAM.gov already have a Unique Entity ID (SAM) which can be viewed in SAM.gov. The transition to UEI (SAM) will not impact an entity's registration expiration date or when renewal is necessary.

System of Award Management (SAM) registration and renewal can take as long as 10 business days to complete.

If you do not have an Employer Identification Number (EIN), the process can take up to five weeks to obtain an EIN from the Internal Revenue Service. There is no fee associated with these processes. These processes cannot be expedited.

SAM registration procedures can be accessed at <https://www.sam.gov>.

The person registering with SAM will be the designated SAM E-Business (E-Biz) Point of Contact (POC), who can assign the people who submit applications for the organization (your Authorized Organization Representatives). In addition, you must review your SAM registration once a year.

Step 2: Acquire an Authorized Organization Representative (AOR) and a Grants.gov username and password.

Complete the AOR profile on Grants.gov and create a username and password. An applicant entity's "Unique Entity Identifier (UEI)" must be used to complete this step. For more information about the registration process for organizations and other entities, visit the [Grants.gov registration page](#). Individuals registering with Grants.gov may visit the [Applicant Registration page](#).

Step 3: Acquire confirmation for the AOR from the E-Business Point of Contact (E-Biz POC).

The SAM E-Biz POC at the applicant organization must log into Grants.gov to confirm the applicant organization's AOR. The E-Biz POC will need the Marketing Partner Identification Number (MPIN) password obtained when registering with SAM to complete this step. Note that an organization can have more than one AOR.

Step 4: Search for the funding opportunity on Grants.gov.

Search using the Assistance Listing Title and the Funding Opportunity Number from the solicitation.

Step 5: Access Funding Opportunity and Application Package from Grants.gov.

Select “Apply for Grants” under the “Applicants” column. Enter your email address to be notified of any changes to the opportunity package before the closing date. Click the Workspace icon to use Grants.gov Workspace.

Step 6: Complete and Submit the SF-424 and SF-LLL via Grants.gov.

Within 48 hours after submitting the SF-424 and SF-LLL, the applicant should receive two notifications from Grants.gov. The first will confirm the receipt of the SF-424 and SF-LLL. The second will state whether the SF-424 and SF-LLL has been validated and successfully submitted, or whether it has been rejected due to errors, with an explanation. It is possible to first receive a message indicating that the application is received, and then receive a system-generated rejection notice a few minutes or hours later. Submitting the SF-424 and the SF-LLL well ahead of the Grants.gov deadline provides time to correct the problem(s) that caused the rejection. These system-generated rejection notices are due to inaccurate data or incomplete applications.

Important: DOJ urges each applicant to submit the SF-424 and the SF-LLL at least 72 hours prior to the Grants.gov due date to allow time to receive validation messages or rejection notifications from Grants.gov and to correct in a timely fashion any problems that may have caused a rejection notification. Verify the application deadline (date and time) in the solicitation.

Step 7: Register the Entity Administrator (E-Biz POC) and the Application Submitter with DOJ’s Justice Grants System (JustGrants).

(Application Submitters and E-Biz POC Users with an existing JustGrants Account may skip to step 8.)

Within 24 hours of JustGrants receiving an application from Grants.gov, the user submitting the application in Grants.gov and SAM E-Biz POC will receive an email to register for a JustGrants account. The email is from DOJ’s secure user management system (DIAMD) and will include instructions on how to create an account.

To ensure that you receive these emails and that they are not flagged as spam, we recommend adding **DIAMD-NoReply@usdoj.gov** to the trusted sender list in your email settings.

The E-Biz POC at the applicant organization serves as the Entity Administrator and must log in to JustGrants to confirm the entity’s profile, add users, and assign the two required Authorized Representatives (Law Enforcement Executive/Program Official and Government Executive/Financial

Official). The Authorized Representatives are officials who have ultimate and final responsibility for all programmatic and financial decisions for your agency, as the legal recipient. For guidance on who should be assigned as Authorized Representatives, please see below:

For law enforcement agencies, COPS Office awards require that both the top law enforcement executive (e.g., chief of police, sheriff, or equivalent) and the top government executive (e.g., mayor, board chairman, or equivalent) sign the application, and (if awarded funding) accept the award package. Both the top law enforcement executive and the top government executive must be assigned the role of Authorized Representative in Just Grants.

For non-law enforcement agencies (institutions of higher education, school districts, private organizations, etc.), COPS Office awards require that both the programmatic official (e.g., executive director, chief executive officer, or equivalent) and financial official (e.g., chief financial officer, treasurer, or equivalent) sign the application, and (if awarded funding) accept the award package. These two officials must have the ultimate signatory authority to sign contracts on behalf of your organization. Both the programmatic official and the financial official must be assigned the role of Authorized Representative in Just Grants.

Please note that nonexecutive positions (e.g., clerks, trustees) are not acceptable Authorized Representatives.

The user who submitted the application in Grants.gov serves as the Application Submitter. Within minutes of completing your JustGrants account registration, the Application Submitter and the E-Biz POC (Entity Administrator) users will receive an email from JustGrants with a link to the application started in Grants.gov.

Application Submitters and E-Biz POC Users with a JustGrants Account

Step 8: Review and Invite the Two Required Authorized Representatives in JustGrants

The Entity Administrator will need to log into JustGrants to review and assign the required two Authorized Representatives (Law Enforcement Executive/Program Official and Government Executive/Financial Official). The Authorized Representatives are officials who have ultimate and final responsibility for all programmatic and financial decisions for your agency, as the legal recipient. For guidance on who should be assigned as Authorized Representatives, please see guidance above.

If an Authorized Representative needs to be invited, the Entity Administrator will need to invite the individual to receive a JustGrants account. These actions are required before an application can be submitted.

Within minutes of being invited to be an Authorized Representative, the individual will receive an email from **DIAMD-NoReply@usdoj.gov** with instructions on how to create an account in DOJ's secure user management system.

Once the Authorized Representatives receives the email and completes the steps to create an account, the Authorized Representative will be available in JustGrants.

Review the “[JustGrants User Roles Guide](#)” to become familiar with the various JustGrants Entity User roles.

Step 9: Complete and Submit the JustGrants Application

Important: In addition to the Application Submitter, the Entity Administrator and the two Authorized Representatives should be available to assist with the JustGrants application submission.

The Application Submitter will complete the application by entering data into web-based forms, uploading attachments, and accepting assurances and certifications. Before you submit your application, each section must be completed and free of validation errors. If not, please return to each identified page using the table of contents on the right side of the page. If any required fields are unanswered, they will be flagged with warning messages. In this case, answer these required fields. You will not be able to submit your application until all validation issues are corrected and the application is certified.

The Application Submitter will also need to confirm the required two Authorized Representatives (Law Enforcement Executive/Program Official and Government Executive/Financial Official).

The Application Submitter will need to select two authorized representatives via dropdown field in the “Confirm Authorized Representative” section of the application. The dropdown will display all authorized representatives that have been assigned for your entity (the [Application Submission Job Aid Reference Guide](#) for this step).

If you do not see authorized representatives for your entity in the dropdown field within the “Confirm Authorized Representative” section of the application, you will need to add and assign the role for each authorized representative for your entity. Please note: the COPS Office requires two authorized representatives (Law Enforcement Executive and Government Executive) for its grant applications. Users will not be visible in JustGrants until they have successfully logged into JustGrants. If you need assistance adding users and assigning roles for your entity, please refer to the [Entity Management Job Aid Reference Guide](#).

Once all sections are completed, the application submitter will submit the application. Upon successful submission of an application, the Application Submitter, Entity Administrator, and the two Authorized Representatives will receive an email from JustGrants confirming submission of the application. The COPS Office will not accept applications submitted via mail or email.

Step 10: Confirm Receipt of JustGrants Application

The Application Submitter should closely monitor their email and JustGrants accounts for any notifications from Grants.gov or JustGrants about a possible failed submission. The user who is authorized to submit applications on behalf of the organization is the one who will receive these notifications. The COPS Office does not send out these notifications, nor does the COPS Office receive a

copy of these notifications. It is the applicant's responsibility to notify the COPS Office of any problems with the application submission process. Submitting the application components **at least 48 hours prior to the solicitation deadline** will enable the applicant to receive notice of a failed submission and provide an opportunity to correct the error before the applicable deadline.

Submission Dates and Time

All completed applications must be submitted by the deadline.

Late Submissions

The COPS Office will review on a case-by-case basis requests for late submission due to unforeseen technical issues or extraordinary events such as extreme weather emergencies or mass casualty events. Requests for an extension of the Grants.gov deadline must be received no later than 5:00 p.m. ET on the next business day after the Grants.gov solicitation deadline. Requests for an extension of the JustGrants deadline must be received no later than 5:00 p.m. ET on the next business day after the JustGrants deadline. No late submission requests will be considered after the extension requests deadline. Extension of deadlines is rare and is not guaranteed.

To be considered for an extension, applicants must contact the COPS Office Response Center via email at AskCopsRC@usdoj.gov detailing the technical/extraordinary issues that impact application submission. This email must be submitted prior to the deadline for which the applicant is requesting an extension. The applicant's email must include the following information: UEI number, Organization name, Point of contact name and information, Application ID, and the nature of the issue/disaster and how it affected the applicant's ability to submit an application on time. The email subject line should read "[Insert Program] Extraordinary Circumstances: [UEI number, Agency Name, Application ID]", with your UEI number and organization name and details filled in.

The COPS Office will respond to each applicant as soon as possible with either an approval and instructions for submission or a rejection. If the technical issues you reported cannot be validated, the application will be rejected.

The following conditions are not valid reasons to request an extension: (1) failure to begin the registration process in sufficient time; (2) failure to follow instructions on Grants.gov or JustGrants; (3) failure of the two assigned authorized representatives, with the proper authority, to activate accounts in JustGrants prior to application submission; (4) failure to follow all of the instructions in the solicitation; (5) failure to register or update information on the SAM website; and (6) failure to register or complete the SF-424 and SF-LLL in Grants.gov.

Application Review Information

The COPS Office is committed to ensuring a fair and open process for making awards. The COPS Office will review the application to make sure that the information presented is reasonable, understandable, measurable, achievable, and consistent with the solicitation.

To maintain the integrity of the competitive solicitation process, the COPS Office can provide publicly available technical assistance regarding the mechanics of the application but cannot evaluate the merits of an application during the open solicitation period.

Review Process

Applications will undergo a standard review and selection process, which includes a review of basic minimum requirements, peer review panel ratings, administrative compliance review, a senior leadership review and recommendation panel, and director's selection. A description of each phase is provided in the following sections. Applicants are encouraged to review their own applications prior to submission, with particular attention given to the Basic Minimum Requirements and each of the Review Criteria specified in the descriptions that follow.

Basic Minimum Requirements Review

Once the solicitation closes, COPS Office staff screen and evaluated applications for compliance with basic minimum requirements (BMR). Applications should be written with clarity, organization, and soundness in the proposed work, with all mandatory attachments.

BMR Review Criteria

Applications that are missing any of the following basic minimum requirements will be disqualified and therefore not scored by review panels.

- Applicant must provide a proposal narrative.
- Applicant must provide a separate budget narrative that is 60 percent or more allowable.
- The applicant must be a law enforcement training academy or state-level regulatory body with the authority to establish training standards or mandate training curriculum for law enforcement.
- The proposed project must be within the scope of the solicitation.

Peer Review

Peer review will evaluate applications that meet the eligibility basic minimum requirements. The COPS Office may use internal peer reviewers, external peer reviewers, or a combination to assess applications on technical merit using the solicitation's review. An external peer reviewer is an expert in the subject matter of a given topic area who is not a current federal employee. An internal peer reviewer is a current federal employee who is well-versed or has expertise in the subject matter of the subcategory. Peer feedback is advisory only, although reviewer views are considered carefully.

Peer reviewers will be asked to review applications based on the application subcategory and the goal of the solicitation to develop the capacity of law enforcement to implement community policing strategies by providing guidance on promising practices through the development and testing of innovative

strategies; building knowledge about effective practices and outcomes; and supporting new, creative approaches to preventing crime and promoting safe communities. Reviewers will also be asked to consider the subcategory-specific solicited goals, requirements, and deliverables described in the solicitation language.

Upon completion of their reviews, peer reviewers will recommend applications that should advance to Senior Leadership Review.

Review Criteria

Applications will be evaluated based on the following merit criteria, which the applicant addresses in their application, proposal narrative, budget narrative, budget worksheets, and other attachments. Applications that are not responsive to the solicitation or duplicative of past or ongoing federally funded work will be scored accordingly. Although not an exhaustive list, at a minimum, reviewers will be asked to evaluate applications according to the following criteria:

Problem identification

- Identifies the problem to be addressed by the proposed project and explains the need for federal funding to address the problem
- Describes an organizational philosophy that demonstrates an understanding of de-escalation concepts and crisis response concepts and how these ideas can be integrated into a comprehensive law enforcement training program

Project description

- Clearly identifies how the project will develop, revise, and enhance academy curriculum (Academy path) or statewide law enforcement training (Commission path)
- Demonstrates an understanding of curriculum integration
- Clearly identifies how the project will integrate the teaching of de-escalation and crisis response skills throughout the entire recruit training program (Academy path) or statewide law enforcement training program (Commission path)
- If proposing to purchase equipment or technology, identifies the type of purchase proposed and the vendor(s) (if known)
- If proposing to purchase equipment or technology, clearly identifies how the purchase will contribute to the development or enhancement of a broader de-escalation and crisis response training program

Project reach and impact

- Describes how an integrated academy curriculum will complement and add to existing efforts to promote de-escalation and crisis response training and practice among the department or departments serviced by the academy (Academy path)

- Describes how integrating de-escalation and crisis response training throughout statewide training regulations, standards, and programs will complement and add to existing efforts statewide (Commission path)
- Explains how the expected outcomes of the project will be sustained after the performance period of the award has ended
- Identifies relevant deliverables resulting from the project

Management and implementation

- Describes organizational leadership support for the project
- Describes support for the project from the leadership of the agency or agencies served by the academy (Academy path) or law enforcement leaders statewide (Commission path)
- Identifies key project staff and their experience in support of agency capacity to carry out the project
- Includes a project timeline that is detailed and realistic

Budget

- Provides a comprehensive budget with costs that are allowable, reasonable, and appropriate given the goals of the project
- Provides a budget narrative with a detailed breakdown of each budget category allowing the reader to clearly understand how each dollar requested will be spent
- Matches the budget and the budget narrative to the tasks and deliverables identified in the application
- Provides appropriate budget support documentation, which may include a current indirect cost rate agreement, sole source justification, consultant rate justification, or vendor quotes

Administrative Compliance Review

All advancing applications will undergo an administrative compliance review. Past financial and programmatic performance with DOJ award funding will be considered in this review process. Past performance may affect the overall rating and ranking of an application. Factors that may be included in the past performance review include the following:

- The extent to which the applicant has adhered to all special conditions in the prior awards
- The extent to which the applicant has complied with programmatic and financial reporting requirements
- The extent to which the applicant has completed closeout of prior awards in a timely manner
- Whether the applicant has received financial clearances in a timely manner

- Whether the applicant has resolved any issues identified in an audit or on-site monitoring visit in a timely manner
- Whether the applicant has adhered to single audit requirements
- The extent to which the applicant has completed work and spent prior award funds in a timely manner

Pursuant to 2 C.F.R. Part 200 (“Uniform Guidance”), before award decisions are made, the COPS Office also reviews information related to the degree of risk posed by applicants. Among other things to help assess whether an applicant with one or more prior federal awards has a satisfactory record with respect to performance, integrity, and business ethics, the COPS Office checks whether the applicant is listed in SAM as excluded from receiving a federal award. The COPS Office also must review and consider any information about the applicant that appears in the nonpublic segment of the integrity and performance system accessible through SAM (currently, the Federal Awardee Performance and Integrity Information System, “FAPIIS”).

Applicants may review and comment on any information about them in SAM that a federal awarding agency previously entered in the designated integrity and performance system, and such applicant comments will also be reviewed and considered.

The COPS Office may contact applicants regarding budget and financial questions as part of the review process. This outreach is not an indication of funds or awarding decisions.

Senior Leadership Review

The Senior Leadership Review is conducted by senior-ranking federal employees. During this process all advancing applications from peer review are evaluated based on peer review feedback, administrative compliance review, past performance, project scope, and budget.

Senior Leadership will submit formal recommendations for funding to the COPS Office Director.

Director’s Selection

Absent explicit statutory authorization or written delegation of authority to the contrary, all final award decisions will be made by the Director of the COPS Office, who may also give consideration to factors including prior funding history, current award balances, underserved populations, population served, geographic diversity, strategic priorities, past performance, significant concerns regarding ability of the applicant to administer federal funds, and available funding when making awards.

Federal Award Notices

Award notification will be sent electronically from JustGrants. This award notification will include instruction on enrolling in Automated Standard Application for Payments (ASAP) and accepting the award. Recipients will be required to log into JustGrants to review, sign, and accept the award. The

notice of award will contain details about the award including start and end dates, funding amounts, and the award conditions. The Authorized Representatives must acknowledge having read and understood all sections of the award instrument and submit the required declaration and certification to accept the award; these steps will be completed electronically in JustGrants before you will be able to draw down funds or begin implementing the program. By accepting the award and the COPS Office funding, your agency acknowledges that it will comply with these conditions and, if applicable, additional special conditions specific to your agency.

It is anticipated that awards will be announced on or after **October 1, 2024**. Any public announcements will be posted on the [COPS Office website](#).

All award decisions are final and not subject to appeal.

To officially accept and begin your award, your organization must access your award package at <https://justgrants.usdoj.gov/>. Once you access your account, you will review and electronically sign the award document (including award terms and conditions) and, if applicable, the special award conditions or high-risk conditions within 45 days of the date shown on the award congratulatory letter, unless an extension is requested and granted. The two assigned Authorized Representatives (Law Enforcement Executive/Program Official and Government Executive/Financial Official) as described in the How to Apply section are required to sign the award package. If the Authorized Representative(s) changes between the time of application submission and award receipt, the Entity Administrator will need to update the Authorized Representative(s) in JustGrants. Your organization will not be able to draw down award funds until the COPS Office receives your signed award document. For more information on accepting your award, please visit the [JustGrants Training page](#) for step-by-step instructions.

For technical support with JustGrants, please call JustGrants Support at JustGrants.Support@usdoj.gov, or 833-872-5175. For programmatic assistance, please contact the COPS Office Response Center at AskCopsRC@usdoj.gov.

The Award Package

The award package is the document indicating your official award funding amount, the award number, the award terms and conditions, and award start and end dates.

The award start date indicated in the award package means that your organization may be reimbursed for any allowable costs incurred on or after this date. The duration of awards is 24 months.

Your FY24 award number is in the following format: 15JCOPS-24-XX-XXXXX-XXXX. The COPS Office tracks award information based upon this number; therefore, it is important to have your organization's award number (or your organization's UEI number) readily available when corresponding with the COPS Office.

The award terms and conditions are listed in the award package. In limited circumstances, your award package may include additional special conditions or high-risk conditions that prevent your organization from drawing down or accessing award funds until the special conditions or high-risk conditions are satisfied as determined by the COPS Office.

By accepting the award, you are acknowledging that you are obtaining federal funds from the COPS Office. As part of that agreement, if awarded funds, your organization will acknowledge that it will comply with all applicable award terms and conditions including any special or high-risk conditions.

Administrative and National Policy Requirements

If selected for funding, in addition to implementing the funded project consistent with the approved project proposal and budget, the recipient must comply with award terms and conditions and other legal requirements including, but not limited to, OMB, DOJ, or other federal regulations that will be included in the award or incorporated into the award by reference or are otherwise applicable to the award.

The COPS Office strongly encourages applicants to review applicable requirements and terms and conditions prior to submitting an application. Terms and conditions for COPS Office awards are available on the COPS Office website in the Application Resource Guide. Terms and conditions are subject to change before the award is issued. The [FY24 Resource Guide for Community Policing Advancement \(CPA\) Programs](#) also contains additional requirements which apply to this application and award, including audit requirements, suspension, and termination requirements.

Terms, Conditions, and Award Requirements

Please review carefully the [FY24 Resource Guide for Community Policing Advancement \(CPA\) Programs](#) for a full description of each of the listed terms, conditions, and other requirements for this COPS Office program. By submitting your application, your organization assures the COPS Office that you agree to the terms, conditions, and requirements. If awarded funds, by accepting your COPS Office award, your organization agrees to comply with all of the terms, conditions, and other requirements in your award package and any additional special or high-risk conditions that may be imposed on your award.

Administrative Actions and Legal Remedies Related to Federal Awards

Please be advised that an application may not be funded or, if awarded, a hold may be placed on this application if it is deemed that the applicant is not in compliance with federal civil rights laws, is not cooperating with an ongoing federal civil rights investigation, or is not cooperating with a U.S. Department of Justice award review or audit.

Misuse of COPS Office funds or failure to comply with all COPS Office award requirements may result in legal sanctions including suspension and termination of award funds, the repayment of expended funds, ineligibility to receive additional COPS Office funding, and other remedies available by law.

Under the False Claims Act, any credible evidence that a person has submitted a false claim or has committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving COPS Office funds may be referred to the Office of Inspector General (OIG). The OIG may be contacted at oig.hotline@usdoj.gov, <https://oig.justice.gov/hotline/index.htm>, or 800-869-4499.

Remedies for Noncompliance

Under 2 C.F.R. § 200.339, if the recipient fails to comply with award terms and conditions, the Federal awarding agency may impose additional conditions or take one or more of the following actions as appropriate in the circumstances:

- Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
- Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- Wholly or partly suspend or terminate the Federal award.
- Initiate suspension or debarment proceedings as authorized under 2 C.F.R. Part 180 and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).
- Withhold further Federal awards for the project or program.
- Take other remedies that may be legally available.

Prior to imposing sanctions, the COPS Office will provide reasonable notice to the recipient of its intent to impose sanctions and will attempt to resolve the problem informally. Appeal procedures will follow those in the U.S. Department of Justice regulations in 28 C.F.R. Part 18.

Awards terminated due to noncompliance with the federal statutes, regulations, or award terms and conditions will be reported to the integrity and performance system accessible through SAM (currently FAPIIS).

False statements or claims made in connection with COPS Office awards may result in fines, imprisonment, debarment from participating in federal awards or contracts, and any other remedy available by law.

Please be advised that recipients may not use COPS Office funding for the same item or service also funded by another U.S. Department of Justice award.

Federal Awarding Agency Contact(s)

For technical assistance with submitting the SF-424, please call the Grants.gov customer service hotline at 800-518-4726, send questions via email to support@Grants.gov, or consult the [Grants.gov Organization Applicant User Guide](#). The Grants.gov Support Hotline operates 24 hours a day, 7 days a week, except on federal holidays.

For technical support with the Justice Grants System (JustGrants) application, please contact the JustGrants Support at JustGrants.Support@usdoj.gov or 833-872-5175. The JustGrants Support operates Monday through Friday between the hours of 5:00 a.m. and 9:00 p.m. Eastern Time (ET) and Saturday, Sunday, and federal holidays from 9:00 a.m. to 5:00 p.m. ET. Training on JustGrants can also be found at <https://justicegrants.usdoj.gov/training-resources>.

For programmatic assistance with the requirements of this program, please contact the COPS Office Response Center at AskCopsRC@usdoj.gov. The COPS Office Response Center operates Monday through Friday, 9:00 a.m. to 5:00 p.m. ET, except on federal holidays.

Freedom of Information Act and Privacy Act (5 U.S.C. §§ 552 and 552a)

All applications submitted to the COPS Office (including all attachments to applications) are subject to the federal Freedom of Information Act (FOIA) and to the Privacy Act. By law, DOJ may withhold information that is responsive to a request if DOJ determines that the responsive information is protected from disclosure under the Privacy Act or falls within the scope of one or more of the nine statutory exemptions under FOIA. DOJ cannot agree not to release some or all portions of an application/award file in advance of a request pursuant to the FOIA.

In its review of records that are responsive to a FOIA request, the COPS Office will withhold information in those records that plainly falls within the scope of the Privacy Act or one of the statutory exemptions under FOIA. (Some examples include certain types of information in budgets and names and contact information for project staff other than certain key personnel.) In appropriate circumstances, the COPS Office will request the views of the applicant/recipient that submitted a responsive document.

Feedback to the COPS Office

To assist the COPS Office in improving its application and award processes, we encourage applicants to provide feedback on this solicitation, the application submission process, and the application review peer review process. Provide feedback via email to AskCopsRC@usdoj.gov with the following subject line: "FY24 [Insert Program Here] Program Feedback."

Important: This email is for feedback and suggestions only. Replies are not sent from this mailbox. If you have specific questions on any program or technical aspect of the solicitation, you must contact the COPS Office Response Center at AskCopsRC@usdoj.gov.

COPS Office Other Information

Reporting, monitoring, and evaluation requirements

Reporting

If awarded, your organization will be required to submit quarterly Standard Form 425, Federal Financial Reports (FFR) as well as semiannual Programmatic Performance Reports. Recipients should be prepared to track and report program award funding separately from other funding sources (including other COPS Office federal awards) to ensure accurate financial and programmatic reporting on a timely basis. Recipients should ensure that they have financial internal controls in place to monitor the use of program funding and ensure that its use is consistent with the award terms and conditions. Good stewardship in this area includes written accounting practices, use of an accounting system that tracks all award drawdowns and expenditures, and the ability to track when award-funded positions are filled or approved purchases are made. Failure to submit complete reports or submit reports in a timely manner will result in the suspension and possible termination of a recipient's COPS Office award funding or other remedial actions.

Monitoring

Federal law requires that agencies receiving federal funding from the COPS Office be monitored to ensure compliance with their award conditions and other applicable statutory regulations. The COPS Office is also interested in tracking the progress of our programs and the advancement of community policing. Both aspects of award implementation—compliance and programmatic benefits—are part of the monitoring process coordinated by the U.S. Department of Justice.

Awarded organizations will be responsible for submitting Programmatic Performance Reports on a semiannual basis and SF-425 - Federal Financial Reports on a quarterly basis. In addition, awarded organizations will be responsible for the timely submission of a final Closeout Report and any other required final reports. All COPS Office recipients will be required to participate in such award monitoring activities of the U.S. Department of Justice, including but not limited to the COPS Office, the Office of the Inspector General, or any entity designated by the COPS Office.

Please note that the COPS Office may take a number of monitoring approaches, such as site visits, enhanced office-based award reviews, alleged noncompliance reviews, and periodic surveys to gather information and to ensure compliance. The COPS Office may seek information including, but not limited to, your organization's compliance with nonsupplanting and both programmatic and financial requirements of the award, and your organization's progress toward achieving your community policing strategy. Grant Operations staff are particularly interested in confirming that the purchase of items and/or services is consistent with the applicant's approved award budget as reflected on the Financial Clearance Memorandum and Final Funding Memorandum.

If awarded funds, you agree to cooperate with and respond to any requests for information pertaining to your award in preparation for any of the above-referenced award monitoring activities.

Please feel free to contact your COPS Office Program Manager to discuss any questions or concerns you may have regarding the monitoring, reporting, and evaluation requirements.

Program Evaluation

Though a formal assessment is not a requirement, awarded organizations are strongly encouraged to conduct an independent assessment of their respective award-funded projects. Project evaluations have proven to be valuable tools in helping organizations identify areas in need of improvement, providing data of successful processes, and reducing vulnerabilities.

Selected award recipients shall be evaluated on the local level or as part of a national evaluation, pursuant to guidelines established by the Attorney General. Such evaluations may include assessments of individual program implementations. In select jurisdictions that are able to support outcome evaluations, the effectiveness of funded programs, projects, and activities may be required. Outcome measures may include crime and victimization indicators, quality of life measures, community perceptions, and police perceptions of their own work.

Financial Management and System of Internal Controls

Award recipients and subrecipients must, as set out in the Uniform Guidance at 2 C.F.R. § 200.303, do the following:

- Establish and maintain effective internal control over the federal award that provides reasonable assurance that [the recipient (and any subrecipient)] is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework” issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- Comply with federal statutes, regulations, and the terms and conditions of the federal awards.
- Evaluate and monitor [the recipient’s (and any subrecipient’s)] compliance with statutes, regulations, and the terms and conditions of federal awards.

- Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
- Take reasonable measures to safeguard protected personally identifiable information and other information the federal awarding agency designates as sensitive or [the recipient (and any subrecipient)] considers sensitive, consistent with applicable federal, state, local, and tribal laws regarding privacy and obligations of confidentiality.

Audit Requirement

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 C.F.R. Part 200, Subpart F – Audit Requirements, available at <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F> establish the requirements for organizational audits that apply to COPS Office award recipients. Recipients must arrange for the required organization-wide (not award-by-award) audit in accordance with the requirements of Subpart F.

Civil Rights

All recipients are required to comply with nondiscrimination requirements contained in various federal laws. A memorandum addressing federal civil rights statutes and regulations from the Office for Civil Rights, Office of Justice Programs will be included in the award package for award recipients. All applicants should consult the Assurances form to understand the applicable legal and administrative requirements.

Funding to Faith-Based Organizations

Faith-based or religious organizations are eligible, on the same basis as any other organization, to participate in any DOJ program for which they are otherwise eligible. A faith-based or religious organization that participates in DOJ-funded programs or services will retain its independence from government, and may continue to carry out its mission, including the practice and expression of its religious beliefs, as long as it does not use direct financial assistance from DOJ to support any explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization. Further guidance on federal financial assistance for faith-based organizations can be found at <https://www.ojp.gov/program/civil-rights-office/partnerships-faith-based-and-other-neighborhood-organizations> and <https://www.justice.gov/opa/pr/department-justice-announces-joint-final-rule-regarding-equal-treatment-faith-based>.

Section 508 of the Rehabilitation Act

If you are an applicant using assistive technology and you encounter difficulty when applying, please contact the COPS Office Response Center at AskCopsRC@usdoj.gov.

The department is committed to ensuring equal access to all applicants and will assist any applicant who may experience difficulties with assistive technology when applying for awards using the JustGrants System.

Public Reporting Burden: Paperwork Reduction Act Notice

The public reporting burden for this collection of information is estimated to be up to 11.3 hours per response, depending upon the COPS Office program being applied for, which includes time for reviewing instructions. Send comments regarding this burden estimate or any other aspects of the collection of this information, including suggestions for reducing this burden, to the Office of Community Oriented Policing Services, U.S. Department of Justice, 145 N Street NE, Washington, DC 20530; and to the Public Use Reports Project, Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503. For any questions or comments, please contact David Neely, COPS Office Paperwork Reduction Act Program Manager, at 202-514-8553.

You are not required to respond to this collection of information unless it displays a valid OMB control number. The OMB control number for this application is 1103-0098, and the expiration date is 05/31/2024.

Performance Measures

To assist in fulfilling the U.S. Department of Justice's responsibilities under the Government Performance and Results Act Modernization Act (GPRA Modernization Act) of 2010, P.L. 111–352), recipients who receive funding from the Federal Government must measure the results of work that funding supports. This act specifically requires the COPS Office and other federal agencies to set program goals, measure performance against those goals, and publicly report progress in the form of funding spent, resources used, activities performed, services delivered, and results achieved.

Performance measures for this program will include the following:

- Extent to which COPS Office award funding (e.g., officers, equipment, training, technical assistance) has increased your agency's community policing capacity
- Extent to which COPS Office knowledge resources (e.g., publications, podcasts, training) have increased your agency's community policing capacity

The objective of these performance measures is to increase the capacity of law enforcement agencies to implement community policing strategies that strengthen partnerships for safer communities and enhance law enforcement's capacity to prevent, solve, and control crime through funding for personnel, technology, equipment, and training.

Recipients will rate the effectiveness of the COPS Office funding in increasing community policing capacity. Data will be collected on a periodic basis through performance reports.

COPS Office awards target increasing recipient capacity to implement community policing strategies within the three primary elements of community policing: (1) problem solving, (2) partnerships, and (3) organizational transformation. The COPS Office requires all applicants to describe how the personnel, technology, equipment, supplies, travel, or training requested will assist the applicant in implementing community policing strategies.

To read an overview of the principles of community policing, please see the COPS Office publication [Community Policing Defined](#).

As part of the programmatic performance reports, all recipients will be required to report on their progress toward implementing community policing strategies. Based on the data collected from recipients, the COPS Office may make improvements to the program to better meet the program's objective and law enforcement agency needs.

Application Checklist

Please refer to the [JustGrants DOJ Application Submission Checklist](#).