



COPS

COMMUNITY ORIENTED POLICING SERVICES
U.S. DEPARTMENT OF JUSTICE

Universal Hiring Program

Universal Hiring Program Grant Owner's Manual

The seal of the U.S. Department of Justice is faintly visible in the background. It features an eagle with wings spread, perched on a shield. The shield is decorated with stars and stripes. The eagle is surrounded by a circular border containing the text "DEPARTMENT OF JUSTICE" and the Latin motto "QUI PRO DOMINA JUSTITIA SEQUITUR".

Universal Hiring Program

Grant Owner's Manual

This manual was created to assist COPS Universal Hiring Program (UHP) grantees with the administrative and financial matters associated with the grant.

For more information about your agency's UHP grant, contact your COPS Grant Program Specialist by calling the U.S. Department of Justice Response Center at 800.421.6770.

U.S. Department of Justice
Office of Community Oriented Policing Services (COPS)
1100 Vermont Avenue, N.W.
Washington, D.C. 20530

COPS Online: www.cops.usdoj.gov

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Getting Started

Congratulations on receiving a grant from the U.S. Department of Justice, Office of Community Oriented Policing Services (COPS). Your agency's COPS Universal Hiring Program (UHP) grant provides funding directly to law enforcement agencies for the hiring and deployment of new, additional, career law enforcement officer position(s) into community policing roles.

This COPS UHP Grant Owner's Manual will assist your agency with the administrative and financial matters associated with your grant. It was developed by the COPS Office to ensure that all UHP grantees clearly understand and meet the requirements of their grants. Please review this manual carefully, because a failure to follow grant requirements can have serious ramifications. Please do not hesitate to call the COPS Office through the U.S. Department of Justice Response Center at 800.421.6770 if assistance is needed with the implementation of your grant.

Thank you for providing us with the opportunity to work in partnership with your community.

For assistance, call the
U.S. Department of Justice
Response Center at
800.421.6770
or visit
www.cops.usdoj.gov



I. Grant Acceptance, Terms, and Conditions

To officially accept and begin your Universal Hiring Program (UHP) grant, your agency must review, sign and return the original Award Document to:

**Universal Hiring Program Control Desk
U.S. Department of Justice
Office of Community Oriented Policing Services (COPS)
1100 Vermont Ave., N.W., 8th floor
Washington, D.C. 20530**

Your agency will not be able to draw down grant funds until the COPS Office receives your original, signed Award Document.

Signatures on the Award Document must be original – photocopies, faxed copies, stamps, and/or electronic signatures will not be accepted. For more information on drawing down grant funds, please see Section II, "Accessing Grant Funds."

The Award Document

The Award Document is the one-page, double-sided document indicating your official grant funding amount, the number of officer positions awarded, the grant number, the grant conditions, and the award start and end dates.

The Award Document is preprinted with your agency's law enforcement and government executives' names and addresses. If this information is incorrect or has changed, please complete the Change of Information Form included in your award packet, and mail it to the COPS Office with your signed Award Document. **Please do not make corrections to the original Award Document.** Once you have reviewed your Award Document, please sign it, make a copy for your records and mail the original document with original signatures (copies cannot be accepted) back to the COPS Office.

Your grant number is in the following format: 2004-ULWX-0000 or 2004-UMWX-0000 for grants awarded in FY 2004, 2005-ULWX-0000 or 2005-UMWX-0000 for grants awarded in FY 2005, etc. The COPS Office tracks grant information based upon this number. Therefore, it is important to have your agency's grant number (and/or your agency's ORI number or DUNS number) readily available when corresponding with the COPS Office.



For grantees that received multiple UHP awards *prior to January 1, 2001*, please note that prior to that date, all UHP grants awarded to a particular agency were assigned the same grant number, regardless of the number of UHP grants awarded to that agency (i.e., "supplemental" awards). For purposes of grant tracking and clarity, all UHP grants awarded on or after January 1, 2001 will receive a unique grant number (the change is not retroactive to grants made before that date). Please refer to the [Glossary of Terms](#) for additional explanation.

What is a Revised Budget Summary?

A Revised Budget Summary may be included along with your Award Document and Financial Clearance Memorandum if your agency's budget has changed by more than \$50 from the original budget submission at the time of application. The final grant amount on this document may differ from the estimated amount on your agency's original grant application request. The difference may be due to disallowed items, budget miscalculations and/or other changes to the budget.

Please review the Revised Budget Summary carefully: your agency is agreeing to use UHP funds to pay for costs only as they are identified in the revised budget, and those costs may be different from what was submitted in your application. If you have any questions about the revision, please refer to your Financial Clearance Memorandum, which is included in your award package. If you need further assistance, please contact the COPS Finance Division. After you review and understand the Revised Budget Summary page, please sign it, make a copy for your records and mail the original back to the COPS Office along with your signed Award Document and payment selection sheet.

Grant Conditions

The grant conditions are listed on the back of your agency's Award Document. By accepting this grant, you are entering into an agreement with the U.S. Department of Justice, Office of Community Oriented Policing Services (COPS). As part of that agreement, your agency acknowledges that it will comply with these conditions (and possibly additional conditions specific to your agency). The section that follows describes in detail each of the award conditions, their rationale and implications. It also addresses many frequently asked questions.



In special cases, a grant condition that your agency may receive will prevent drawdown of or access to your funds until it is satisfied. It should be clear to you when you review the Award Document and any corresponding grant conditions which, if any, would prevent drawdowns until satisfied. However, if you have any questions about these conditions, please call your Grant Program Specialist.

Reasons for Grant Conditions

The requirements of your UHP grant are established within:

- The Public Safety Partnership and Community Policing Act of 1994 under which the COPS Office was established;
- Applicable rules, regulations and policies issued by the U.S. Department of Justice, Office of Management and Budget (OMB), the General Accounting Office (GAO), and the United States Treasury; and
- The specific Universal Hiring Program programmatic requirements established by the COPS Office.

A list of source documents for this booklet is provided in Appendix

A. You may request copies of any source reference document from:

Office of Administration, Publication Unit
New Executive Office Building, Room G 236
Washington, D.C. 20503

COPS-specific documents may be requested directly from the COPS Office.

Review of Grant Conditions

By signing the Award Document to accept this UHP grant, your agency agrees to abide by the following grant conditions:

1. GRANT OWNER'S MANUAL

The grantee agrees to abide by the terms, conditions and regulations as found in this COPS Universal Hiring Program Grant Owner's Manual and the Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, 28 C.F.R. Part 66, or the Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations, 28 C.F.R. Part 70, as applicable.



Why This Condition:

This manual has been designed to inform you of the laws, regulations and policies that apply to your grant. Your agency will be responsible for the information and rules contained in this manual. More detailed guidance can be requested through your Grant Program Specialist.

What You Should Do:

Please read the entire UHP Grant Owner's Manual carefully prior to signing the grant Award Document. For additional information, you may also wish to read the Grant Monitoring Standards and Guidelines for Hiring and Redeployment, which can be found online at www.cops.usdoj.gov. If you have any questions, please contact your COPS Grant Program Specialist. When accepting your grant award, you should ensure that the proper reporting and financial systems are in place to satisfy grant requirements.

2. ALLOWABLE COSTS

The funding under this project is for the payment of approved entry-level salaries and fringe benefits over three years (for a total of 36 months of funding) for new, additional, career law enforcement officer positions, hired on or after the award start date. The Financial Clearance Memorandum included in your award packet specifies the costs that your agency is allowed to fund with your UHP award. It will also describe any costs which have been disallowed after review of your proposed budget. **Your agency may not use UHP funds for anything not identified as allowable in the Financial Clearance Memorandum.**

Only actual costs incurred during the grant period will be eligible for drawdown. Thus, if your agency experiences some kind of cost savings over the course of the grant (for example, in your agency's grant application, the salary and benefits for an entry-level officer were overestimated), your agency may not use that money to extend the length of the grant. Rather, any funds remaining after an agency has drawn down for the costs of salaries and benefits incurred during the 36 month funding period per grant position will be de-obligated according to federal regulations during the closeout process, and should not be spent by your agency.

Why This Condition:

The Universal Hiring Program funds may only be used to pay for entry-level salaries and benefits for 36 months for new, additional career law enforcement officers hired on or after the award start date.

What You Should Do:

Refer to your Financial Clearance Memorandum (and Revised Budget Summary, if applicable) for the list of approved allowable costs. Salaries covered by UHP must be based on your agency's standard entry-level salary and benefits package under the laws or rules that govern hiring by your agency. Salary and fringe benefit payments must be based on payroll records supported by time and attendance records or their equivalent. The types of records your agency must keep to document that you are following this grant condition are described in Section IV of this manual. Any portion of salaries and/or benefits above entry-level must be provided by the grant recipient, in addition to the required local match.

Overtime, training, weapons, communication equipment and vehicles cannot be funded with your UHP award. However, if you train your officers prior to swearing them in, grant funds may be applied to salaries and benefits paid to the new officers during training if this is your agency's standard policy for all newly-hired officers.

3. LOCAL MATCH

Unless waived in writing by the COPS Office, grantees are required to contribute a local match of at least 25 percent towards the total cost of the approved grant project. The local match must be a cash match. The source of the match must be made from funds not previously budgeted for law enforcement purposes.

Why This Condition:

The Universal Hiring Program grant is a matching grant. Unless specifically waived in writing by the COPS Office, this type of grant requires grantees to contribute a local cash match towards the total cost of the approved project.



What You Should Do:

At the time of application, your agency submitted budget sheets reflecting the total project cost of hiring additional entry-level law enforcement officer(s) for three years. The COPS Finance Division reviewed your budget and has approved allowable costs, which are documented in the Financial Clearance Memorandum (FCM) accompanying your official grant Award Document. You should review the FCM carefully and note the federal share awarded as well as the local share that must be contributed in a cash match by your agency. For additional information and possible sources of funding for the local match, see Section III, "Meeting the Local Match," in this manual.

4. SUPPLEMENTING, NOT SUPPLANTING

UHP grant funds must be used to hire (on or after the award start date) one or more additional, new career law enforcement officer positions, beyond the number of officer positions that would be hired or employed by the grantee with local funds in the absence of the grant. Unless authorized in writing by the COPS Office, grant funds may not be applied to the salary or benefits of an officer hired prior to your UHP award start date.

Why This Condition:

The Public Safety Partnership and Community Policing Act of 1994 specifically states that federal funds under COPS programs may not be used to supplant, or replace, local or state funds (or funds supplied by the Bureau of Indian Affairs) that would be spent on law enforcement purposes in the absence of the COPS grant. For the UHP program, this means that UHP funds may not supplant state, local, or Bureau of Indian Affairs funds that otherwise would be spent to fund sworn law enforcement officer positions.

What You Should Do:

To meet this grant condition, your agency must ensure that:

- Each officer hired under UHP is newly hired on or after your grant award start date. You may not fill the UHP position(s) with any officer who was hired prior to the award start date, unless an exception is authorized in writing by the COPS Office.

- The officer(s) that your agency hires will bring your sworn force to a number over and above the number of officer positions that were budgeted (funded) as of the date of your UHP application, plus any additional officer positions budgeted with state or local funds during the grant period.
- During the life of your grant, your agency must continue to hire as many new, locally-funded officers as you would have if you had not received the grant. You may not cancel, reallocate, or postpone spending money in your budget that is or otherwise would be committed to hiring other new officers.
- Positive and timely steps are taken to fill any locally-funded vacancies resulting from retirement, resignation or other reasons with new locally-funded officers.
- Local, state, or BIA-funded sworn officer positions are not reduced as a result of receiving UHP funds.

Your agency should maintain records to show compliance with this provision. For example, you should maintain records of hire dates, budget records showing the number of budgeted sworn officer positions before and during the grant, vacancy rates or patterns before and during the grant, the timing of assignment of newly hired officers to UHP funded positions, the standard operating procedures for recruiting and hiring new officers, documentation (such as agency personnel records or minutes from city council meetings) reflecting the reasons why locally-funded vacancies were not filled on a timely basis pursuant to standard operating procedures or the specific reasons for each reduction of locally (or state or BIA) funded sworn officer positions, or any other relevant records.

If your sworn officer budget is reduced at any time during the COPS grant period, or you are unable to fill locally-funded vacancies within your agency's standard operating procedure, we advise contacting the COPS Office immediately so that we may review your circumstances to determine what steps, if any, should be taken to ensure compliance with this grant condition.



5. RETENTION

At the time of application, your agency committed to retaining each additional UHP officer position awarded for at least one full local budget cycle at the conclusion of the thirty-six (36) month grant funding period for that position, over and above the number of State or locally-funded positions that would otherwise exist. You cannot satisfy the retention requirement by using UHP positions to fill vacancies from attrition. Please be aware that the legal grantee is ultimately responsible for the retention of any officer position(s), even if that grantee contracts for law enforcement services from another agency.

Why This Condition:

The Public Safety Partnership and Community Policing Act of 1994 envisioned that the additional sworn officer positions should be maintained by localities beyond the COPS funding period.

What You Should Do:

At the time of application, your agency submitted a signed retention plan or Retention Plan Certification that outlined your agency's commitment to plan to retain all additional COPS-funded positions for one full local budget cycle following the 36-month grant period. The COPS-funded position(s) must be retained using state, local, tribal, or other non-COPS funding. You must maintain records that document when the 36-month grant period expired for each position, demonstrating that each position was retained above and beyond the number of officer positions that your agency would have otherwise funded, and showing that the position was not retained by attrition.

Please note that UHP grant funding corresponds to the officer position(s) awarded and not the individuals actually filling the grant position(s). Therefore, if for any reason the officer filling a position funded by the UHP grant leaves your department during the retention period, your agency must take active and timely steps to backfill (replace) that position with a newly hired officer until the retention period is completed. If your agency finds itself in circumstances that do not allow for retention, you should contact your Grant Program Specialist immediately for further review.

6. COMMUNITY POLICING

Community policing activities to be implemented by your agency were identified and approved in your UHP grant application, including those to assist in homeland security or anti-terrorism activities. Under the Universal Hiring Program, there must be an increase in the level of community policing activities that are being performed in your jurisdiction as a result of the grant.

The tragic events of September 11, 2001 have added a new dimension to community policing. Today, terrorism preparedness and prevention have become key roles for state and local law enforcement agencies. A successful strategy to prevent terrorism involves an array of activities, many of which rely on productive partnerships between local law enforcement and the communities they serve.

Consistent with local, state and national homeland security goals and objectives, any agency applying for UHP funds during FY 2003 or after could be required to demonstrate how UHP funds will assist in terrorism preparedness, response and other homeland security activities through community policing. Any general homeland security or anti-terrorism requirements of your UHP grant were specified in the grant application. If at the time of application your agency was required to identify homeland security or anti-terrorism activities to be performed by your UHP-funded officers, your agency should implement those activities during the active grant period.

Why This Condition:

The Universal Hiring Program is designed to promote community policing through increasing officer presence in the community. Similarly, community policing is a policing philosophy that promotes and supports organizational strategies to address the causes and reduce the fear of crime and social disorder in communities. This is achieved through problem-solving tactics and community policing partnerships. It enhances police professionalism by providing officers with the skills, technology, and motivation to act in innovative ways to solve community crime-related problems.



What You Should Do:

Community policing activities to be implemented by your agency were identified in your UHP grant application. Any subsequent changes to the community policing activities that were listed in your UHP application should be addressed in your progress reports. Your agency is not limited to those community policing activities outlined in your application – community policing activities may be amended as needed. However, significant changes to the community policing activities identified in your UHP application must receive *prior written approval* from the COPS Office. Changes are "significant" if they deviate from the range of possible community policing activities identified and approved in your UHP application.

7. ASSURANCES AND CERTIFICATIONS

The grantee acknowledges its agreement to comply with the Assurances and Certifications forms that were signed and submitted as part of its UHP application.

Why This Condition:

Although the COPS Office has made every effort to simplify the process of applying for and receiving grants, provisions of federal law require us to seek your assurances and certification regarding certain matters. Most of these assurances and certification apply to all grants provided by the federal government.

What You Should Do:

Your agency signed the Assurances and Certifications forms at the time of application. Your agency is responsible for reviewing and ensuring that the terms agreed to when signing the Assurances and Certifications are fulfilled. Additional copies of the Assurances and Certifications forms are contained in Appendix B of this manual. If you have any questions about them, please contact your Grant Program Specialist.

8. EXTENSIONS

The COPS Office does not offer extensions that provide additional officers or federal funds for your UHP award. However, a no-cost time extension may be requested to provide your agency with additional time to complete grant requirements. A no-cost time extension can be requested for a variety of reasons, including delays in hiring COPS-funded positions, officer turnover, or other circumstances that interrupt the 36-month grant-funding period. An extension allows your agency to compensate for such delays by providing an additional amount of time to complete the full 36 months of funding for each position awarded.

Why This Condition:

Under federal regulations, requests to extend the grant period require *prior written approval* from the COPS Office. Without an approved extension, your ability to continue performance under the grant award and your funding will stop automatically at the end of the original grant period. However, where justified, the COPS Office seeks to accommodate reasonable requests for additional time to complete a grant.

What You Should Do:

The COPS Office will mail an Extension Request Worksheet to your agency in the last quarter of your UHP grant. If your agency needs more time to complete the grant, simply complete the form and mail or fax it back to:

**Universal Hiring Program Control Desk
U.S. Department of Justice/COPS
1100 Vermont Ave., N.W.
Washington, D.C. 20530**

Fax: 202.514.1335

Please note that once your agency has filled a grant-funded position, you should carefully track the total number of months that the position remains filled under the grant. Be sure to note any periods of vacancy or hiring delays. Should your agency need an extension, your records of the total amount of time each position has served under the grant will be critical in helping you to determine how much additional time to ask for in your extension request.



For example, suppose your agency was awarded a full-time position under UHP. Due to the recruitment/testing process, the position was not filled until 12 months after your award start date. Additionally, that officer left your department at some point during the grant period, and it took six months to backfill that position. In short, the position was vacant for 18 months during the active grant period. Subsequently, your agency would then request an 18-month extension to compensate for the aforementioned delays.

Upon receipt of your extension request, the COPS Office will evaluate your request in order to determine if an extension is warranted. Please be advised that extension requests are granted on a case-by-case basis, and the COPS Office reserves the right to deny any extension request. If you did not receive or cannot locate your Extension Request Worksheet, please contact the COPS Office and we will be happy to assist you.

Finally, some grantees find that extra federal funds remain at the end of the 36-month grant period due to salary and fringe benefits costs that were lower than anticipated. Please note that grantees are entitled to a maximum of 36 months of funding based on the approved salary and benefit costs in the Financial Clearance Memorandum. Thus, if extra funds remain at the end of your grant, your agency is not allowed to extend your grant beyond 36 months for the purpose of using those surplus funds. Rather, your agency should not draw down those funds. The COPS Office will deobligate any excess funds at closeout. If you have any additional questions regarding an extension, please contact your Grant Program Specialist.

9. GRANT MODIFICATIONS

Occasionally, a change in an agency's fiscal or law enforcement situation necessitates a change in its UHP award. For instance, a grantee is awarded ten full-time positions, but due to fiscal constraints, must reduce its request to five full-time positions. In another example, an agency awarded four 20-hour part-time positions may find it necessary to modify them to two full-time positions due to changing law enforcement needs.

Grant modifications under UHP are evaluated on a case-by-case basis. All modification requests must be approved, in writing, by the COPS Office, prior to their implementation. In addition, please be aware that the COPS Office will not approve any modification request that results in an increase of federal funds.

Why This Condition:

Under federal regulations, you are required to expend funds only as approved in the Financial Clearance Memorandum. Any requests to change or alter grant awards require prior written approval. Without prior written approval, you must continue to implement your grant as it was originally awarded and accepted by your agency.

What You Should Do:

You should notify the COPS Office if you determine that your agency will not be able to hire some or all of the awarded positions. If you wish to modify your grant award, you must submit a written request on your agency's letterhead referencing your grant number, the proposed changes, details of why the change is needed, etc. (for further information and complete requirements, contact your Grant Program Specialist). The COPS Office will then evaluate your request, and notify your agency, in writing, of our decision. Your agency must wait until receiving written approval from the COPS Office before implementing the proposed changes to the grant. Please note that modification approval letters for active grants will often be accompanied by a Modified Award Document reflecting the approved changes. If so, your agency is required to sign and return the original Modified Award Document to officially accept the modification. It can be mailed to the COPS Office at the following address:

**Universal Hiring Program Control Desk
U.S. Department of Justice/COPS
1100 Vermont Ave., N.W.
Washington, D.C. 20530**

10. EQUAL EMPLOYMENT OPPORTUNITY PLAN (EEOP)

Recipient agencies that meet certain criteria are required to maintain and submit an acceptable Equal Employment Opportunity Plan (EEOP) for review by the Office of Civil Rights, Office of Justice Programs. If you need help in preparing an EEOP, please consult the *Civil Rights Seven-Step Guide to the Design and Development of an Equal Employment Opportunity Plan* included in your grant award package.



Why This Condition:

The purpose of an Equal Employment Opportunity Plan (EEOP) is to ensure full and equal participation of men and women regardless of race or national origin in the work force of the recipient agency. EEOPs do not impose quotas or hiring requirements. The U.S. Department of Justice (DOJ) regulations regarding the requirements for an EEOP for federal grant recipients and the required contents of the document are fully explained in 28 C.F.R. 42.301 et seq.

What You Should Do:

U.S. DOJ regulations require you to prepare and maintain an EEOP if your organization:

- (i) Has 50 or more employees; and
- (ii) Received a total of \$25,000 or more in grants or subgrants; and
- (iii) Has three percent or more minorities in its service population. Even if there is less than three percent of minorities in the service population, the DOJ regulations require that the EEOP be written to focus on women.

If your agency meets the above criteria and received \$500,000 or more (or a total of \$1 million in grant funds during an 18-month period), you are required to submit the EEOP within 60 days of the grant award start date to:

**Office of Civil Rights
Office of Justice Programs
810 7th Street, N.W.
Washington, D.C. 20531**

If your agency meets the above criteria but your grant is for less than \$500,000 and you have received less than \$1 million in grant funds during an 18-month period, you must complete and return the one-page EEOP Certification form within 60 days of your grant award to advise us whether you have an EEOP in effect or whether you are exempt from this requirement. A blank copy of the EEOP Certification form can be found in the *Civil Rights Seven-Step Guide to the Design and Development of an Equal Employment Opportunity Plan*. If you have any questions regarding the EEOP requirements, please contact the Office of Civil Rights at 202.307.0690 for further assistance.



11. REPORTS

To assist the COPS Office in the monitoring of your award, your agency will be responsible for submitting periodic reports regarding both the programmatic and financial progress of your grant. As those reports become due, your COPS Grant Program Specialist and Staff Accountant can assist you if needed.

Why This Condition:

The Public Safety Partnership and Community Policing Act of 1994 and other federal regulations require careful grant monitoring to ensure the proper use of federal funds. In addition, the COPS Office seeks to document, on a continuing basis, the progress of our programs and our grantees.

What You Should Do:

This grant condition is to make your agency aware of reporting requirements associated with UHP grants. For more information on reporting, please see Section VI of this manual.

12. CONTRACTS WITH OTHER JURISDICTIONS

A. Contracts to provide law enforcement services:

Grantees that provide law enforcement services to another jurisdiction through a contract must ensure that officers funded under this grant will not service the other jurisdiction, but will only be involved in activities or perform services that exclusively benefit the grantee's own jurisdiction.

Why This Condition:

This grant is intended to benefit the community of the grantee. Therefore, the grantee must use the UHP grant funding to benefit its own population exclusively, rather than "contracting out" the COPS-funded officer(s) to other jurisdictions.

What You Should Do:

The officer positions that have been funded under UHP cannot be contracted by your agency to other agencies *unless* they will still directly benefit your agency's jurisdiction. For example, a sheriff's department cannot contract their UHP position to a neighboring county. However, if the sheriff's department directly provides law enforcement services to several towns *within* its county, the department may then contract with one or more of those towns to provide them with the services of a UHP officer.



B. Contracts to receive law enforcement services:

Municipalities that do not have their own law enforcement agency, but instead contract for law enforcement services, may receive a UHP grant to supplement their locally-funded contract with additional officers. However, the additional UHP-funded officers must exclusively service the grantee's community. In this case, the grantee is identified as the municipality that applied for and received the grant in its name (as opposed to the law enforcement agency that is servicing the contract).

Additionally, while a neighboring law enforcement agency may supply the officers under the terms of a contract, the grantee is ultimately responsible for ensuring compliance with all grant requirements.

Why This Condition:

If a grantee uses its UHP grant to contract for the services of an officer from another jurisdiction's police department or sheriff's office, the grantee must ensure compliance with the terms and conditions of its UHP grant.

What You Should Do:

If your agency will contract with another department to fill the COPS-funded UHP position(s), you must ensure that the contract complies with the terms and conditions of your UHP grant. Please note that UHP-funded officers must be used to supplement, and not replace, any officer positions that are currently provided to your agency through an existing law enforcement contract. For more information, please see grant condition # 4 on page 6 (Supplementing, Not Supplanting).

13. EVALUATION

The COPS Office may conduct or sponsor national evaluations of the community policing activities of its grantees and other COPS-funded initiatives. The grantee agrees to cooperate with the evaluators.

Why This Condition:

The Public Safety Partnership and Community Policing Act of 1994 states that evaluations of the program may be carried out or commissioned by the Attorney General for the furtherance of the purposes of the Act. The COPS Office conducts evaluations to determine what programs are working, how programs may be improved and why certain programs are working better than others.

Specifically, the COPS Office may assess the way in which your agency implements its community policing program. In some jurisdictions, COPS staff or evaluators may study the effectiveness of funded programs, projects and activities. Evaluators may collect information about the programs' effects on crime, victims of crime and the quality of life in communities. In addition, they may ask questions about how residents feel about community policing and how police feel about their work. This information will be useful to other communities and police agencies across the country.

What You Should Do:

When evaluations are undertaken, you may be contacted in writing with specific requests for information. In general, evaluators may need to speak with individuals in your department, observe activities of your department, and obtain written reports about and from your department. You will be asked to facilitate any site visits and information-gathering activities. In addition, you will be asked to provide accurate and timely information about your grant activities.

14. EMPLOYMENT ELIGIBILITY

The grantee agrees to complete and keep on file, as appropriate a Bureau of Citizenship and Immigration Services Employment Eligibility Verification Form (I-9). This form is to be used by recipients of federal funds to verify that persons are eligible to work in the United States.

Why This Condition:

Under federal immigration law, all employers are required to take certain steps to ensure that persons that are hired are legally permitted to work in the United States. The Bureau of Citizenship and Immigration Services Employment Eligibility Verification Form (I-9) outlines the types of documents that an employer should review to confirm that a new hire is eligible to be employed.

What You Should Do:

You do not need to submit any documentation to the COPS Office to satisfy this condition. Rather, you should complete and maintain the I-9 forms for all new employees under the guidelines set forth by the Bureau of Citizenship and Immigration Services. For further information about this requirement, you may call the Office of Business Liaison at 800.357.2099 or the National Customer Service Center at 800.375.5283.



15. GRANT MONITORING ACTIVITIES

The COPS Office performs various functions to ensure compliance with all grant requirements, to assess the implementation of community policing in awarded jurisdictions, and to provide technical assistance to grantees. Grant monitoring activities are routine during the grant period and may occur up to three years following the end of the grant funding. These functions, and others, often require the production of grant-related documentation and other materials. As a COPS UHP grantee, you agree to cooperate with any such requests for information.

Why This Condition:

The Public Safety Partnership and Community Policing Act of 1994 states that each grant program must contain a monitoring component. The COPS Office actively monitors how grantees are adhering to COPS grant requirements and develops the best technical assistance based on this feedback.

What You Should Do:

Your agency may be required to accommodate routine and non-routine efforts by the COPS Office, or an entity designated by COPS, to examine your agency's use of federal funds, both programmatically and financially. The most common ways are:

- 1) Site Visits – Certain grants are selected for on-site monitoring visits. If selected, your agency will be notified in writing in advance of any on-site review of your COPS grants. This review is generally performed over a one or more day period and also provides an opportunity for agency representatives to seek assistance on any grant implementation issues. Your agency will be notified in writing of the results and any action required to remedy identified grant violations.
- 2) Office Based Grant Reviews (OBGRs) – Certain grants are selected for a review conducted at the COPS Office. If selected, your agency will be contacted at the start of this review and our staff will correct any grant problems or deficiencies through telephone, fax and/or written correspondence with your agency.
- 3) Complaints – The COPS Office responds to complaints from citizens, labor associations, media, and other sources. Written complaints or allegations are reviewed by the COPS Office Grant Monitoring Division, and may result in a review of your agency's grants to determine compliance with grant conditions.

Grantees are responsible for remedying any grant noncompliance that is identified through these or other monitoring or auditing activities. Remedies for noncompliance may include, but are not limited to: suspending grant funding, repaying misused grant funds, voluntary withdrawal from or involuntary termination of remaining grant funds, and bars from receiving future COPS grants. To avoid findings of noncompliance, grantees are strongly encouraged to contact the COPS Office at any time during the life of a COPS grant with questions concerning grant requirements and also to maintain all relevant documentation that may demonstrate grant compliance. For more information, please contact the COPS Office Grant Monitoring Division at 800.421.6770 or 202.514.9202.

Accepting the Grant Award

After you have reviewed the conditions of your UHP award, you are ready to accept the award. The Director of the COPS Office has signed the Award Document indicating approval of your grant, an obligation of federal funds to your organization, and our commitment to the award. As stated at the beginning of this section, to officially begin your grant and draw down your funds, the **authorized officials** (the law enforcement and government executives) must sign the Award Document and return the **original** copy to:

**Universal Hiring Program Control Desk
U.S. Department of Justice
Office of Community Oriented Policing Services (COPS)
1100 Vermont Ave., N.W., 8th Floor
Washington, D.C. 20530**

Since COPS is required to maintain the original Award Document with original signatures in our files, faxed copies of the Award Document cannot be accepted.

Who should sign the award for our agency?

The "authorized officials" are the law enforcement and government executives who have **ultimate and final** responsibility for all programmatic and financial decisions regarding this grant as representatives of the legal grantee. COPS grants require that **both** the top law enforcement executive (e.g., Chief of Police, Sheriff or equivalent) and the top government executive (e.g., Mayor, Chair of the County Commission or equivalent) sign the award document.



Typically, these are the same executives who signed the UHP application documents (if or when one or both of these individuals have changed, please complete a Change of Information form and submit it to the COPS Office). If you have any questions as to who should sign the award, please contact your jurisdiction's local legal advisor.

When must the Award Document be returned?

Please return the original signed Award Document within 90 days of receipt. Grant funds will not be released until we have received your agency's original signed Award Document, your budget has received final clearance, and any other relevant grant conditions particular to your agency have been satisfied. *Failure to submit your signed Award Document within the 90-day award acceptance period may result in your UHP grant being withdrawn and the funds deobligated without additional notification.* If your agency requires an extension for accepting the award beyond the 90-day acceptance time frame, please submit a written request to your Grant Program Specialist. Be sure to explain the circumstances that prevent your agency from returning the Award Document within the 90-day period, and identify the date by which the Award Document will be signed and mailed to the COPS Office. The COPS Office will review such requests on a case-by-case basis. The COPS Office reserves the right to deny requests to extend the 90-day award acceptance period.

What if we need to make programmatic changes to our grant?

Your agency must seek and receive **prior written approval** if you plan to make major programmatic changes in your grant, including but not limited to:

- A reduction in the number of officers to be hired under your UHP grant.
- Significant changes in your community policing plan.
- Salary and benefit changes.
- Extensions to the length of the standard three-year award period.



To make such changes, you are required to request prior approval in writing from the COPS Office. Please document your reason(s) for the proposed changes, how they will affect your grant project, and any other information that will assist us in reviewing the changes. All change requests for your UHP grant should be sent, in writing, to your Grant Program Specialist. Upon reviewing your request, COPS may contact you for additional information or clarification. The COPS Office reserves the right to deny any request to change a grant.

Why might our agency be subject to sanctions or grant termination, and what are the possible sanctions?

The COPS Office has the right to sanction or terminate your project when there is reason to believe that you:

- Are not substantially complying with grant requirements or other applicable provisions of federal law;
- Are failing to make satisfactory progress toward the goals or strategies in your application;
- Are not adhering to grant requirements or conditions;
- Are proposing substantial plan changes to the extent that, if originally submitted, would have resulted in the application not being selected for funding;
- Are not submitting financial or programmatic reports in a timely manner;
- Are filing false statements or certifications in connection with an application, periodic reports or other grant related documents; and/or
- Are providing other good cause for sanctions or termination as determined by the COPS Office.

In these instances, the COPS Office may:

- Temporarily stop payments pending correction of the situation by you;
- Disallow all or part of the cost of the activity or action not in compliance;
- Wholly or partly suspend or terminate your grant award;
- Require that some or all of the grant amounts be remitted to the U.S. Department of Justice;
- Condition a future grant or elect not to provide future grant funds to your agency until appropriate actions are taken to ensure compliance;
- Withhold or bar your agency from obtaining future awards;
- Recommend civil or criminal enforcement; and/or
- Take other remedies that may be legally available.



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

What if we no longer wish to accept this award?

If you have questions about accepting this grant, please contact your Grant Program Specialist to discuss your options by calling 800.421.6770. If your agency chooses not to accept this grant, you must notify us of your decision in writing. A completed Financial Status Report (Standard Form 269-A) should accompany any written request to withdraw, even if no grant funds have been drawn down.

II. Accessing Grant Funds

This section provides answers to payment-related questions. Your award packet contains a number of financial documents including all the information needed to set up your payment method.

Payment Methods

For first-time grantees, there is one method of payment available for accessing federal grant funds – the Phone Activated Paperless Request System, or PAPRS. Existing grantees that are already using PAPRS for previously awarded grants must also use PAPRS for the UHP program (only existing grantees that are currently using LOCES for previously awarded COPS grants can elect to continue to use LOCES for any new grants).

A. PAPRS – Phone Activated Paperless Request System

PAPRS replaces the paper form H-3 (Request for Payment) by enabling grantees to use their touch-tone telephone to request funds. Approved payment requests will be automatically scheduled for payment by the U.S. Treasury Department. The system also provides online information to grantees about the status of their requests.

If you do not have a touch-tone telephone, please contact the U.S. Department of Justice Response Center help line at 800.421.6770. If you need to request a reprinted PAPRS package, please contact the Office of the Comptroller, Customer Service Center, Office of Justice Programs at 800.458.0786.

How do we set up a PAPRS account?

If you are a new grantee to the COPS Office, you should receive a packet of financial documents shortly after COPS receives your original signed Award Document. This packet will contain all of the information that your agency needs to set up your payment method. Your agency will receive a PAPRS user's manual under a separate cover from the Office of the Comptroller, Office of Justice Programs. Once you receive your Office of Justice Programs Vendor Number (which may or may not be the same as your taxpayer identification number) please use your PIN and Grant ID numbers and follow the directions in the user's manual to access your funds.



B. LOCES – Letter of Credit Electronic Certification System

Only existing grantees that are currently using LOCES for previously awarded COPS grants can elect to use LOCES for any new grants. LOCES is a modem communication system that allows recipients of COPS funds to electronically request payment from any of their grant funds and receive direct deposit to their bank accounts within 48 hours. You will need a computer with a dedicated modem to use this system.

1. To make requests for payments through LOCES, you must have a personal computer operating DOS 3.1 or higher. We also recommend you use at least a 28.8 baud modem.
2. Complete and return the LOCES Automation Survey form. Upon receipt, your LOCES software will be customized for your use and forwarded to you.
3. Complete an ACH Vendor/Miscellaneous Payment (SF 3881) enrollment form and forward to your bank.

A complete LOCES form and manual package may be requested by contacting COPS Finance Division at 800.421.6770. In addition, the COPS Finance Division can provide technical assistance on using the LOCES system.

Setting Up Your Account

How do we fill out the payment enrollment forms?

In the award packet, your agency received an Automated Clearing House (ACH) Vendor/Miscellaneous Payment (SF 3881) enrollment form. The ACH Vendor/Miscellaneous Payment (SF 3881) enrollment form must be completed regardless of the payment method. **Prior to accessing your grant funds, your agency must mail the original form to:**

**Office of Justice Programs
Office of the Comptroller
810 7th Street, N.W.
Washington, D.C. 20531**



The COPS Finance Division has completed the "Agency Information" section of this form. Your agency must complete the "Payee/Company Information" section following the directions on the back of the form and also provide the grant number (printed on the Award Document). Next, your financial institution must complete the "Financial Institution Information" section and have the appropriate financial official sign the form.

If you are already a COPS Office grantee, you should already have selected one of the two payment methods and filled out an ACH Vendor/Miscellaneous Payment (SF 3881) enrollment form. However, your agency will be required to complete and submit a new ACH Vendor/Miscellaneous Payment (SF 3881) enrollment form with each new grant awarded. If you have any questions, please call the COPS Finance Division at 800.421.6770.

When should Financial Status Reports be filed?

After your agency returns the signed Award Document to the COPS Office, you are required to submit quarterly Financial Status Reports (FSRs) using a Standard Form 269-A (SF-269A). This report reflects the actual monies spent and unliquidated obligations incurred by your agency. You will not be able to make drawdowns from your grant account if the SF-269A for the most recent reporting quarter ended is not on file with the COPS Office by the deadline date.

For your first SF-269A submission, use the chart below to determine when the most recent SF-269A reporting quarter ended and complete an SF-269A to cover the period from the award start date of your grant to that particular end date. You are required to submit a SF-269A even if you have not spent any money or incurred any costs during a reporting period.

<u>SF-269A Reporting Quarters</u>	<u>Due Date</u>
01-01-YY to 03-31-YY	No later than 05-15-YY
04-01-YY to 06-30-YY	No later than 08-15-YY
07-01-YY to 09-30-YY	No later than 11-15-YY
10-01-YY to 12-31-YY	No later than 02-15-YY



Example:

If your award start date is 02-01-04 and the current date is 04-15-04, then your first SF-269A would be due no later than 05-15-04 and would cover the period 02-01-04 (award start date) through 03-31-04 (end date of the most recent reporting quarter). This SF-269A must be on file with the COPS Office so that you can successfully complete a drawdown of funds through PAPRS or LOCES.

For information on how to complete and where to submit your quarterly FSRs, see Section VI of this Grant Owner's Manual entitled "Reports."

Filing the Financial Status Report identifies your federal and local expenditures made during that calendar quarter. However, to receive actual payment, you must request it through PAPRS or LOCES (see the section on payment methods).

Additional Payment Questions

Can we receive advances?

Yes. If you receive funds through electronic transfer, the period allowed is ten (10) days in advance.

In general, the concept of "minimum cash on hand" applies to COPS grants. This concept requires that your agency request funds based upon immediate cash disbursement needs. You should time your request for payment to ensure that federal cash on hand is the minimum that you need to make your immediate salary and fringe benefit payments. There should be no excess federal grant funds on hand, except for advances not exceeding (10) days, as noted above.

The Federal Government has four basic rules regarding advances. Advances can be terminated if the grantee:

- Is unwilling or unable to attain project goals;
- Maintains excess cash on hand;
- Does not adhere to the terms and conditions of the grant; or
- Fails to submit reliable and/or timely reports.

How often do we request reimbursement of costs?

There are no limitations on how often your agency may request reimbursements. However, reimbursement is only for actual and approved salaries and benefits of officers hired under the Universal Hiring Program. As a general guideline, most agencies request reimbursement on a monthly or quarterly basis.

Can we earn interest on our grant funds?

Your agency should minimize the time between your draw down of grant funds and your payment of grant costs to avoid earning excess interest on your grant funds. You must account for interest earned on advances of federal funds as follows:

- Your agency may keep interest earned on all advances of federal grant funds up to \$250 per fiscal year; and
- Your agency must annually pay back interest earned (over and above \$250 per fiscal year) on advances of federal grant funds to the U.S. Department of Health and Human Services, Payment Management Systems, Rockville, MD 20852.



III. Meeting the Local Match

The COPS Universal Hiring Program provides up to 75 percent or \$75,000 (whichever is less) of the entry-level salary and approved fringe benefits for a newly hired law enforcement officer over a three-year grant period. UHP grantees are responsible for at least 25 percent of the total cost of salaries and approved fringe benefits, unless the local match requirement has been waived in whole or in part, and has been approved in writing by the COPS Office. The match must be a cash match, made from local, state or other non-COPS funds and *may not be paid through reallocating funds already budgeted for law enforcement purposes.*

Matching Funds

What are some sources of matching funds?

Sources for local match requirements may include:

- Program income funds from asset forfeitures.
- Funds from state or local governments that are committed to matching funds for your program.
- Funds from federal programs whose statutes specifically authorize their use as matching funds.
- Funds contributed by private sources.

When and how must the match be made?

Matching contributions must be made on an increasing basis during each year of the three-year program, with the federal share decreasing accordingly. The local match must be paid in full during the active grant period; payments made prior to the UHP award start date or after the grant end date do not qualify as a local match. If you have questions about the timing of your local match payments, please contact your COPS Staff Accountant at 800.421.6770.

Should we maintain records of the match?

Yes, your agency must maintain records of your local share. These records should clearly show the source of the match, the amount of the match, and when the match was contributed. This is necessary to establish that the matching funds were not previously budgeted for law enforcement purposes. You do not need to provide these supporting documents to COPS Office, but such records must be produced in the event of an audit or site visit. In addition, grantees are required to report the amount of local match contributed on the quarterly Financial Status Report SF-269A under "line B."



Waivers

Can the matching requirement be waived?

To maximize the number of communities that can take advantage of COPS grants, only a small portion of local match waiver requests are actually granted. Waiver requests are typically considered when a jurisdiction makes the request at the time of application. Applicants that are able to provide satisfactory documentation of *severe fiscal distress* (see below) may be granted waivers. Post-award waivers will be considered only under the most extreme circumstances.

How are waivers granted?

It is the responsibility of the waiver applicant to demonstrate extreme fiscal distress and its negative impact on their ability to adequately provide law enforcement services to its jurisdiction. Waivers are evaluated on a case-by-case basis, and are based on an agency's ability to demonstrate severe fiscal distress *and* how it has adversely impacted law enforcement services. Any agency requesting a waiver of the local match must submit relevant documentation to support the request. Relevant factors reviewed in a waiver request may include:

- Budgetary imbalance or expenditure cutbacks resulting in significant reductions in other services provided by the applicant;
- Bankruptcy declaration by the applicant in a court of law, or the applicant has been placed into receivership by the state or federal government;
- Significant layoff of personnel within the applicant department;
- Significant downgrading of the applicant's bond rating due to fiscal distress;
- Loss of a major employer or job layoffs which have a significant economic impact on the applicant;
- Location within an area in which a declaration of major disaster has been made pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act; and/or
- Other circumstances demonstrating severe fiscal distress.



How are we notified if a waiver is granted?

Generally, the cover letter and Financial Clearance Memorandum in your grant award package will indicate whether your request for a waiver was granted. If your agency applied for a post-award waiver, you will also receive written notification of our decision. Under some circumstances, agencies that receive waiver approval will receive a Modified Award Document and budget clearance documents. If so, the Modified Award Document must be signed and returned to the COPS Office to accept the waiver. If your agency received a waiver and you have additional questions, please contact your Grant Program Specialist.

Please note that even if your agency receives a waiver of the local match, you are still required to retain all position(s) awarded with local funds for a minimum of one full local budget cycle at the end of the 36-month funding period for each position. For more information, please refer to the Retention Condition (Grant Condition #5) discussed in this manual.

How do we appeal the denial of a waiver?

If your agency's waiver request was denied and you would like to appeal the decision, please submit your written appeal to:

U.S. Department of Justice/COPS
Attn: Deputy Director for Operations
1100 Vermont Avenue, N.W.
Washington, D.C. 20530



IV. Financial Record Maintenance

Under the UHP grant, your agency is required to establish and maintain accounting systems and financial records to accurately account for funds awarded and disbursed. These records must include both federal funds and all matching funds.

Accounting Systems

What accounting systems are required?

Your agency needs to establish and maintain accounting systems and financial records to accurately account for the funds awarded. These records must include both the federal funds and the matching funds from state, local and/or private sources.

Your accounting system should:

- Present and itemize approved costs of salaries and benefits and show the actual costs of salaries and benefits;
- Demonstrate that funds are spent in compliance with your grant conditions; and
- Be able to provide the necessary information for periodic review and audit.

What records must be kept?

Your agency's fiscal control and accounting systems should enable you to make accurate, current and complete disclosure of the financial activity under your UHP grant. Your accounting records should contain information showing expenditures under the grant and must be supported by items such as payroll records, time and attendance records, canceled checks or similar documents.

Your agency must adequately safeguard grant funds and make sure that they are used for authorized purposes only. Your agency will be responsible for refunding any unallowable expenses.

Records should be kept for at least three years from the date that the COPS Office officially closes the grant.



How long must documents be kept?

All financial records, including payroll, time and attendance records, canceled checks and similar documents associated with your COPS UHP grant should be kept for at least three years from the date COPS officially closes the grant. If any litigation, claim, negotiation, audit or other action involving these records has been started before the end of the three-year period, the records should be kept until completion of the action. These records should be easily located and should be properly protected against fire or other damage. *Failure to maintain adequate records to document grant expenditures may result in a requirement to repay all federal funds that cannot be supported with appropriate records.*

Your agency should maintain records so that you can identify them by grant year or by fiscal year, whichever you find more convenient.

What if we have more than one grant?

If your agency has more than one COPS grant or grant from another federal agency, funds received under one project may not be used to support another project without specific written authorization from COPS, or in the case of a grant from another agency, from both awarding agencies. Your accounting systems and financial records must reflect expenditures for each project separately.

Who may access our records?

Authorized federal representatives, including representatives from the U.S. Department of Justice, the Comptroller General of the United States, the COPS Office, and any entity designated by the COPS Office may access these records for the purposes of conducting audits, site visits or other examinations.

Records should be kept for at least three years from the date that the COPS Office has officially closed your agency's grant.



V. Federal Audit Requirements

Audit Requirements

In addition to oversight, guidance and counsel provided by the COPS Office, your grant may be subject to an audit by independent examiners. The two primary types of audit are Single Audit Act (SAA) audits and Department of Justice (DOJ) Office of the Inspector General (OIG) audits.

What are the regulations governing SAA requirements?

The Single Audit Act of 1984 established uniform guidelines for state and local governments receiving federal financial assistance. The 1984 Act was amended in July 1996 to reflect revised audit criteria and reporting requirements. The Office of Management and Budget Circular A-133, Audits of States, Local Governments and Non-Profit Organizations, provides additional guidelines regarding the implementation of SAA requirements.

Who must have an SAA audit?

Each non-federal entity that expends \$300,000 (\$500,000 for fiscal years ending after December 31, 2003) or more in a fiscal year shall have a Single Audit conducted except when it elects to have a program-specific audit conducted. SAA audits are conducted annually unless a state or local government is required by constitution or statute, in effect on January 1, 1987, to undergo audits less frequently than annually. The primary objective of an SAA audit is to express opinions on the grantee's financial statements, internal controls, major and non-major grant programs, and compliance with government laws and regulations. Single audits may also address specific compliance issues with respect to COPS grant requirements.

If the U.S. Department of Justice is your Cognizant Federal Agency (see Glossary of Terms for definition), your Single Audit Act reports should be sent to the Federal Audit Clearinghouse at:

Federal Audit Clearinghouse
Bureau of Census
1201 E. 10th Street
Jeffersonville, IN 47132



The U.S. Department of Justice, Office of Justice Programs (OJP) serves as the liaison between grantees and auditors in the conduct of SAA audits. Questions and comments regarding OIG audits and SAA audits may be directed to the Department of Justice Response Center at 800.421.6770.

What is the role of the Office of the Inspector General?

The OIG is a separate component of the Department of Justice and is independent of the COPS Office. The primary objective of OIG audits is to assess compliance with grant conditions. OIG audits are designed to promote economy, efficiency, and effectiveness in the administration of grants by evaluating compliance with laws, regulations, and policies/procedures governing the operations encompassed in the scope of the audit.

On what basis are COPS grants selected for an OIG audit?

Occasionally, the OIG conducts a COPS grant audit in response to a referral that the OIG believes warrants further evaluation. The OIG also surveys DOJ agencies on an annual basis to solicit input on suggested audit areas for the upcoming fiscal year. In most instances, however, the OIG selects grants based on a number of factors, including the geographical distribution of grants awarded, award amount, population served, and type of grant. As such, the fact that your grant has been selected for an OIG audit is not necessarily indicative of a suspected concern or problem area.

The COPS Audit Division serves as the liaison between grantees and the OIG's Audit Division, which conducts the audit. Questions and comments regarding audit reports and the resolution of audit recommendations should be referred to the COPS Audit Division. Questions and comment regarding the administration of your UHP grant, not specifically related to an audit, should be referred to your Grant Program Specialist.



Typical Audit Findings

The OIG has typically reported the following audit findings pertaining to hiring grants as a result of lack of proper documentation, poor business-practices, or inadequate accounting and record keeping systems:

- Unallowable costs – Grantee incurred costs which were not approved in the original budget, were in excess of the approved budget, or were charged to the grant after the expiration date and a grant extension was not obtained.
- Unsupported costs – Specific grant expenditures and reimbursements could not be supported, or grant expenditures were in excess of actual grant costs.
- Supplanting – Grantee did not obtain prior written approval from COPS to assign local sworn personnel to anticipated COPS positions; grantee could not document efforts to backfill vacant local sworn officer positions; or grantee could not explain reductions in local law enforcement budgets or in sworn officer positions during the 36 month grant period.
- Unsupported local match contributions – Grantee did not have adequate accounting and record keeping systems to identify the source(s) of local matching contributions, when the local matching contributions were made, and/or the amount of contributions.
- Lack of complete programmatic and financial reporting – Grantee failed to submit required programmatic and financial reports in a timely manner and/or had inadequate record keeping systems.
- Failure to retain – Grantee lacked documentation to support retention planning efforts during the grant period and/or failed to demonstrate an increase in the baseline of local sworn officer positions at the conclusion of the 36 month grant period, over and above what the grantee would have had in absence of the grant.
- Lack of adequate community policing – Grantee had difficulty demonstrating community policing activities.



VI. Reports

Periodically, your agency will be asked to provide three types of reports: (1) Program Progress Reports; (2) Quarterly Financial Status Reports; and (3) surveys about your hiring status. Failure to submit complete reports, or submit them in a timely manner, may result in the suspension and possible termination of your agency's COPS grant funding or other remedial actions.

Program Progress Reports

There are two types of program Progress Reports:

- A. **Department Initial Report** – This report is required only once during the life of the grant. It will be mailed to you within 30 days after receiving our award packet, and must be returned within 45 days of receipt. Information gathered on the Department Initial Report includes your agency's training curriculum, police force demographics, baseline sworn force levels, and community policing activities.

- B. **Department Annual Report** – This report is required annually during the life of the grant. It is required for each full or partial calendar year in which your agency's grant is active. The Department Annual Report is typically mailed in December of each year and must be completed and returned by mid-February of the following year (the exact return date will be specified in the report). Similar to the Department Initial Report, information will be gathered on the status of your agency's grant implementation.

Financial Status Reports

Your agency is required to submit quarterly Financial Status Reports (FSRs) using a Standard Form 269A (SF-269A). This report reflects the actual federal monies spent and unliquidated obligations incurred, local matching contributions, and the unobligated balance of federal funds.



How do we file Financial Status Reports?

The FSR is due at the COPS Office no later than 45 days following each calendar quarter. A chart showing the reporting quarter end dates and due dates is provided in the section of this manual entitled "Setting Up Your Account." A *Helpful Hints Guide for Completing FSRs* is available at the COPS web site (www.cops.usdoj.gov) or by calling the U.S. Department of Justice Response Center at 800.421.6770.

A blank copy of a SF-269A is included in your award package. Please make copies of the blank form (both sides) and retain them for future use. Fax completed forms to:

COPS Finance Division Control Desk: 202.616.9004
Alternative Fax: 202.514.2852

Or mail to:

U.S. Department of Justice/COPS
1100 Vermont Ave., N.W.
Attention: COPS Finance Division Control Desk
Washington, D.C. 20530

How will grant funds be monitored?

The COPS Office and designated representatives from the Office of the Comptroller, Office of Justice Programs (OJP) monitor the financial aspects of your agency's grant through financial reports, meetings, telephone contacts, reports, audits, reviews of grant change requests and special request submissions. Information may also be requested during an on-site visit.

Surveys About Hiring

The COPS Office may contact your agency by phone, fax, or letter to determine your grant progress, number of officers hired and deployed into community policing roles, and a timetable for when future hiring may occur.

Contact Points to Obtain Technical Assistance and Report Violations

Any alleged violations, serious irregularities, or acts that may result in the use of public funds in a manner inconsistent with the Public Safety Partnership and Community Policing Act of 1994 or the purposes of this grant should be reported to the U.S. Department of Justice. Furthermore, the COPS Office welcomes the opportunity to provide assistance regarding the implementation of grant provisions to help ensure that federal grant funds are spent responsibly. As such, the following contacts are provided to address noncompliance and technical assistance issues:

- If you suspect violations of a criminal nature, please contact the Office of the Inspector General's Hotline at 800.869.4499.
- If you suspect grant noncompliance (*not* criminal in nature) as it relates to the grant conditions listed in this manual, please contact the COPS Grant Monitoring Division at 202.514.9202 or consult the *COPS Grant Monitoring Standards and Guidelines for Hiring and Redeployment* for further information that may help you evaluate your agency's compliance.
- If you have any questions and/or need assistance regarding your grant, please contact your COPS Grant Program Specialist at 800.421.6770.

Assistance regarding community policing plans and practices may also be obtained by visiting COPS online at www.cops.usdoj.gov or by contacting the COPS Office Training and Technical Assistance Division at 800.421.6770.



VII. When the Grant Period Has Ended

At the end of your agency's UHP grant period, the COPS Office is responsible for the "closeout" of your grant. As part of this process, the COPS Office requires documentation that your grant is eligible for closeout.

After the end of the grant period, your agency will be asked to submit a final financial status report and any applicable final program reports.

Final Financial Status Report

The final Financial Status Report (SF-269A) for your grant is due to the COPS Office no later than 90 days after the end of the grant period. The final report should reflect the total amount of federal expenditures, the total amount of matching contributions, and the amount of unobligated funds, if any. The federal funds expended should reflect only the actual allowable and incurred salary and benefits costs for the 36 month grant period that the grant position was occupied. Additionally, it should reconcile with the amount of funds drawn down by your agency and reflect the appropriate local match contribution.

When should all of the grant monies be spent?

Grant funds reflecting allowable project costs must be obligated before the end of the grant period. Obligated funds cover monies spent and expenses for entry-level salaries and approved benefits that your agency has incurred but not yet paid. Your agency has up to 90 days after the end of the grant period to request reimbursement for funds obligated.

It is possible that your agency may have excess grant funds remaining in your account following the 36-month grant period due to an overestimate of the salary and benefit costs during the grant period. Your agency should review its records carefully to ensure that it draws down and expends only the amount required for the actual salary and benefit costs during the 36-month grant period. Any excess unobligated or unspent funds should remain in your account, and will be deobligated during the closeout process.



Final Progress Report

Your agency may be sent a Final Progress Report from the COPS Office and asked to complete it. This will serve as your agency's final report on the grant and should only be completed by agencies that have completed the 36-month grant period. The information your agency provides in the Final Progress Report will be used to make a final assessment of your grant progress. The COPS Office will also use it to determine if your grant is ready for financial and programmatic closeout.

Retention

At the conclusion of the 36-month funding period for each new, additional officer position, your agency should implement its plan, submitted at the time of application, to retain the additional COPS-funded officer position(s) as required by Grant Condition #5 in this manual. As a reminder, the legal grantee entity is ultimately responsible for the retention of any officer positions awarded for a minimum of one full local budget cycle following the 36-month grant funding period for each position. If you have any questions regarding the retention requirement, please contact your Grant Program Specialist at 800.421.6770.

VIII. Conclusion

We hope that this manual has assisted you and your agency with your grant questions. We welcome and encourage any comments you have regarding the COPS Universal Hiring Program and the materials we have developed for its administration. If you have specific comments regarding this manual, please send them to:

COPS Universal Hiring Program Grant Owner's Manual
U.S. Department of Justice
1100 Vermont Ave., N.W.
Washington, D.C. 20530

If you have any questions about your grant, please call the U.S. Department of Justice Response Center at 800.421.6770.



IX. Glossary of Terms

Allowable Costs

Allowable costs are costs that will be paid for by the UHP grant program. The Universal Hiring Program funds salaries and approved fringe benefits over the 36-month grant period for new, additional sworn entry-level officer positions. Upon review of your agency's submitted budget, any unallowable costs were removed and your total budget amount was revised accordingly in a Revised Budget Summary. **Overtime, training, approved salaries and benefits paid during a state-certified training academy where it is the agency's policy to pay all newly hired officers during this training are allowable. Weapons, communications equipment, uniforms, vehicles and indirect costs are not allowable costs.** A copy of the Financial Clearance Memorandum (or revised budget summary, if applicable) from the COPS Finance Division identifying any relevant revisions is included in your grant award package.

Authorized Officials

The authorized officials are the individuals in your organization who have final authority and responsibility for all programmatic and financial decisions regarding this grant award. At the time of application, your agency listed the law enforcement executive (usually the Chief of Police, Sheriff, etc.) and the government executive (usually the Mayor, President of Council, etc.) for your agency. These executives are listed on your Award Document and are understood to be your authorized officials; if any of the executive information is incorrect, please submit the correct information to the COPS Office by completing an official Change of Information form (found through COPS Online at www.cops.usdoj.gov).

Award Start Date

This is the date on or after which your agency is authorized to hire new officer positions under your Universal Hiring Program grant. The award start date is found on your grant Award Document.

Grantees may not hire grant-funded officers prior to this date without written approval from the COPS Office.

Career Law Enforcement Officer

The COPS statute defines a career law enforcement officer as an officer hired on a permanent basis who is authorized by law or by a state/local public agency to engage in or supervise the prevention, detection or investigation of criminal law violations.



Catalog of Federal Domestic Assistance (CFDA)

The CFDA is an annual government-wide publication that contains a description and index of all forms of federal assistance. Each program is assigned a "CFDA number," which is used by auditors to track grant revenues under the Single Audit Act. It is also used in participating states by State Single Points of Contact in conducting the required intergovernmental reviews under Executive Order 12372. The CFDA number for the COPS UHP grant is 16.710.

Cognizant Federal Agency

Your Cognizant Federal Agency is generally the federal agency that provides you with the most federal money. Your Cognizant Federal Agency may have already been assigned to you by the Office of Management and Budget. If this is the first federal grant that your organization has received, the U.S. Department of Justice (DOJ) is your Cognizant Federal Agency.

COPS Finance Division

The COPS Finance Division handles your agency's financial and budgetary needs related to this UHP grant. A Staff Accountant is assigned to your state, and is available to answer any questions that you may have concerning the financial aspects of your grant. To identify your Staff Accountant, please call the U.S. Department of Justice Response Center at 800.421.6770, or visit the COPS web site at www.cops.usdoj.gov.

COPS Office

The Office of Community Oriented Policing Services (COPS) is the division of the U.S. Department of Justice that is the "grantor agency" for your UHP grant. The COPS Office is responsible for assisting your agency with the administration and maintenance of your grant for the entire grant period. You can reach the COPS Office at 800.421.6770.

Data Universal Numbering System (DUNS) Number

Starting in FY 2004, the Office of Management and Budget (OMB) requires all agencies applying for federal funding to obtain this number prior to application. The DUNS number is a unique nine-digit identification number that is assigned upon request to agencies by Dun & Bradstreet (D&B). This number will be used by the federal government to better track grant recipient information throughout the grant cycle and to provide consistent name and address data for electronic grant application systems. To obtain a DUNS number, visit the Dun & Bradstreet website at www.dnb.com or call 866.705.5711.

Employer Identification Number (EIN)/Vendor Number

This number is usually your agency's nine-digit federal tax identification number as assigned to you by the Internal Revenue Service (IRS). Your accounting/bookkeeping department should have this number. In some cases, the EIN has been previously assigned to another agency within your jurisdiction. In this instance, the COPS Office will assign a new vendor number to you. The newly assigned number is to be used for COPS administrative purposes only and should not be used for IRS purposes.

Grant Number

The grant number identifies your agency's specific UHP grant, and can be found on your grant Award Document. This number should be used as a reference when corresponding with the COPS Office.

Grant Program Specialist

COPS Grant Program Specialists are trained to assist you with implementing and maintaining your UHP grant. A Grant Program Specialist is assigned to your state, and is available to answer any questions that you may have concerning the administrative aspects of your grant. Your Grant Program Specialist can assist you with such matters as requesting an extension on your grant or modifying the grant award. To obtain the name and phone number of your Grant Program Specialist, please contact the U.S. Department of Justice Response Center at 800.421.6770, or visit COPS Online at www.cops.usdoj.gov.

Matching Funds/Local Match

Under the Universal Hiring Program, the COPS Office provides up to 75 percent of the entry-level salary and approved fringe benefits of a new, additional career law enforcement officer position over three years, provided the position is hired on or after the award start date. The maximum that the COPS Office can pay per officer position over the three-year grant period is \$75,000, unless a waiver of the local match is granted. Additionally, grantees are responsible for a local match of *at least* 25 percent of the total cost of salaries and fringe benefits, unless a waiver of the local match is granted (see "Meeting the Local Match," Section III of this manual, for more information). The match must be a cash match, and paid with state, local, or other non-COPS funds. Additionally, the source of your agency's local match may not be from any funds previously budgeted for law enforcement purposes.

Obligation of Funds

The COPS Office obligates federal funds when the Director or his/her designated official signs the grant Award Document.



For the grantee, grant funds are obligated when monies are spent directly on officer salaries and fringe benefits under the UHP program. The term "encumbrance" is often used at the local and state levels to describe this type of transaction. Liquidated obligations are considered cash outlays or monies actually spent. Unliquidated obligations are obligations incurred and recorded but not yet paid (accrual basis of accounting) or not yet recorded and not yet paid (cash basis of accounting).

Originating Agency Identifier (ORI) Number

This number is assigned by the FBI, and it is your agency's unique identifier. The first two letters are your state abbreviation, the next three numbers are your county's code, and the final two numbers identify your jurisdiction within your county. It can be found on your grant Award Document. When you contact the COPS Office with a question, please reference your ORI number (and/or your grant number).

The Public Safety Partnership and Community Policing Act of 1994

The purposes of the Act are to:

- Substantially increase the number of law enforcement officers interacting with members of the community;
- Provide additional and more effective training to law enforcement officers to enhance their problem-solving, service and other skills needed in interacting with members of the community;
- Encourage the development and implementation of innovative programs to permit members of the community to assist law enforcement agencies in the prevention of crime; and
- Encourage the development of new technologies to assist law enforcement agencies in reorienting the emphasis of their activities from reacting to crime to preventing crime.

The COPS Office is charged with fulfilling the mandates of this law.

Retention Period

After thirty-six (36) months of COPS funding, UHP grantees are required to retain each additional COPS-funded position awarded, using local, State and other sources of non-COPS funds. Each awarded position must be retained for at least one full local budget cycle (i.e., local fiscal year) after 36 months of funding have expired for that position. This time span is referred to as the "retention period." Please note that if your agency completes its three years of grant funding in the middle of a local budget cycle, your agency is required to retain the COPS-funded position(s) for



the remainder of that budget cycle and through the next complete local budget cycle. Additionally, if your agency has any other active COPS grants, then your agency is required to retain all awarded positions (regardless of program) through the end of the retention cycle of the last active grant.

Supplanting

For the purposes of your COPS UHP grant, supplanting means replacing state or local funds that otherwise would have been spent on sworn officer positions with federal COPS funds. Your agency is prohibited from supplanting throughout the three-year grant period. This means that your agency may not use COPS funds to pay for any sworn officer positions (full-time, part-time, reserve or other) which, in the absence of the COPS program, would otherwise have been funded with state and/or local funds, or funds supplied by the Bureau of Indian Affairs. COPS funds must instead be used to supplement, or increase, your law enforcement budget for sworn officer positions. As a general matter, in assessing the presence of supplanting, throughout the grant period we will expect you to hire new officers at a level consistent with recent historical practice and to take positive and timely steps to fill all vacancies in your sworn personnel resulting from attrition. You may not reduce your local, state or BIA-funded sworn officer position(s) as a result of receiving a UHP grant. For additional information on supplanting, please review Grant Condition #4 in this manual.

Supplemental Grant Award

Prior to Fiscal Year 2001, a Supplemental Grant Award was a new UHP grant award which added monies and officer positions to an agency's existing UHP grant under the same grant award number. For example, if your jurisdiction received a UHP grant in 1996 with a 96-UMWX-0000 grant number, and was then awarded a UHP Supplement in 1997, the COPS Office assigned the supplemental positions and monies under the same grant number as the 1996 award. However, for purposes of grant tracking and clarity, the COPS Office no longer issues Supplemental Grant Awards. Instead, all UHP grants awarded on or after January 1, 2001, including those awarded to agencies with prior UHP grants, now receive a unique grant number, regardless of the number of UHP grants previously awarded. [The change is not retroactive to grants made before January 1, 2001.]

X. Appendices

Appendix A – List of Source Documents

Primary Sources:

Public Safety Partnership and Community Policing Act of 1994, 42 U.S.C.

U.S. Department of Justice, Office of Justice Programs, Financial and Administrative Guide for Grants, OJP M 7100.1D: May 15, 1990

Additional Sources:

Code of Federal Regulations (CFR):

28 CFR Part 66 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments

28 CFR Part 67 Government-wide Requirements for Drug-Free Workplaces (Grants)

28 CFR Part 69 Government-wide New Restrictions on Lobbying

31 CFR Part 205 Treasury Department Regulations Implementing for Cash Management Improvement Act of 1990

OMB Circular A-87 Cost Principles for State and Local Governments

OMB Circular A-33 Audits of Educational Institutions

Assurances for Universal Hiring Program (Included)

Executive Order 12547 "Non-Procurement Debarments and Suspension"

Executive Order 12372, 28 CFR, Part 30 "Intergovernmental Review of Federal Programs"



OMB Circular A-129 Managing Federal Credit Programs

4 CFR Parts 101-105 Department of Justice/General Accounting Office, "Joint Federal Claims Collections Standards"

5 CFR Part 1320 "Controlling the Paperwork Burden on the Public"

Executive Order 12291 "Regulations"

5 CFR Part 151 "Political Activities of State and Local Officials or Employees"



Appendix B – Assurances

Several provisions of federal law and policy apply to all grant programs. We (the Office of Community Oriented Policing Services) need to secure your assurance that the applicant will comply with these provisions. If you would like further information about any of these assurances, please contact your state's COPS Grant Program Specialist at (800) 421-6770.

By the applicant's authorized representative's signature, the applicant assures that it will comply with all legal and administrative requirements that govern the applicant for acceptance and use of federal grant funds. In particular, the applicant assures us that:

1. It has been legally and officially authorized by the appropriate governing body (for example, mayor or city council) to apply for this grant and that the persons signing the application and these assurances on its behalf are authorized to do so and to act on its behalf with respect to any issues that may arise during processing of this application.
2. It will comply with the provisions of federal law which limit certain political activities of grantee employees whose principal employment is in connection with an activity financed in whole or in part with this grant. These restrictions are set forth in 5 U.S.C. § 1501, et seq.
3. It will comply with the minimum wage and maximum hours provisions of the Federal Fair Labor Standards Act, if applicable.
4. It will establish safeguards, if it has not done so already, to prohibit employees 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.
5. It will give the Department of Justice or the Comptroller General access to and the right to examine records and documents related to the grant.
6. It will comply with all requirements imposed by the Department of Justice as a condition or administrative requirement of the grant, including but not limited to: the requirements of 28 CFR Part 66 and 28 CFR Part 70, or the Federal Acquisition Regulations, as applicable (governing cost principles); OMB Circular A-133 (governing audits) and other applicable OMB circulars; the applicable provisions of the Omnibus Crime Control and Safe Streets Act of 1968, as amended; 28 CFR Part 38.1; the current edition of the COPS Grant Monitoring Standards and Guidelines; and with all other applicable program requirements, laws, orders, regulations, or circulars.
7. If applicable, it will, to the extent practicable and consistent with applicable law, seek, recruit and hire qualified members of racial and ethnic minority groups and qualified women in order to further effective law enforcement by increasing their ranks within the sworn positions in the agency.
8. It will not, on the ground of race, color, religion, national origin, gender, disability or age, unlawfully exclude any person from participation in, deny the benefits of or employment to any person, or subject any person to discrimination in connection with any programs or activities funded in whole or in part with federal funds. These civil rights requirements are found in the non-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968, as amended (42 U.S.C. § 3789(d)); Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000d); the Indian Civil Rights Act (25 U.S.C. §§ 1301-1303); Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794); Title II, Subtitle A of the Americans with Disabilities Act (ADA) (42 U.S.C. § 12101, et seq.); the Age Discrimination Act of 1975 (42 U.S.C. § 6101, et seq.); and Department of Justice Non-Discrimination Regulations contained in Title 28, Parts 35 and 42 (subparts C, D, E and G) of the Code of Federal Regulations.
- A. In the event that any court or administrative agency makes a finding of discrimination on grounds of race, color, religion, national origin, gender, disability or age against the applicant after a due process hearing, it agrees to forward a copy of the finding to the Office of Civil Rights, Office of Justice Programs, 810 7th Street, NW, Washington, D.C. 20531.
- B. Grantees that have 50 or more employees and grants over \$500,000 (or over \$1,000,000 in grants over an eighteen-month period), must submit an acceptable Equal Employment Opportunity Plan ("EEO Plan") or EEO Plan short form (if grantee is required to submit an EEO Plan under 28 CFR 42.302), that is approved by the Office of Justice Programs, Office for Civil Rights within 60 days of the award start date. For grants under \$500,000, but over \$25,000, or for grantees with fewer than 50 employees, the grantee must submit an EEO Certification. (Grantees of less than \$25,000 are not subject to the EEO Plan requirement.)
9. Pursuant to Department of Justice guidelines (June 18, 2002 Federal Register (Volume 67, Number 117, pages 41455-41472)), under Title VI of the Civil Rights Act of 1964, it will ensure meaningful access to its programs and activities by persons with limited English proficiency.
10. It will ensure that any facilities under its ownership, lease or supervision which shall be utilized in the accomplishment of the project are not listed on the Environmental Protection Agency's (EPA) list of Violating Facilities and that it will notify us if advised by the EPA that a facility to be used in this grant is under consideration for such listing by the EPA.



11. If the applicant's state has established a review and comment procedure under Executive Order 12372 and has selected this program for review, it has made this application available for review by the state Single Point of Contact.

12. Pursuant to Executive Order 13043, it will enforce on-the-job seat belt policies and programs for employees when operating agency-owned, rented or personally-owned vehicles.

13. It will not use COPS funds to supplant (replace) state, local, or Bureau of Indian Affairs funds that otherwise would be made available for the purposes of this grant, as applicable.

14. If the awarded grant contains a retention requirement, it will retain the increased officer staffing level and/or the increased officer redeployment level, as applicable, with state or local funds for a minimum of one full local budget cycle following expiration of the grant period.

15. It will not use any federal funding directly or indirectly to influence in any manner a Member of Congress, a jurisdiction, or an official of any government, to favor, adopt, or oppose, by vote or otherwise, any legislation, law ratification, policy or appropriation whether before or after the introduction of any bill, measure, or resolution proposing such legislation, law, ratification, policy or appropriation as set forth in the Anti-Lobby Act, 18 U.S.C. 1913. False statements or claims made in connection with COPS grants (including cooperative agreements) may result in fines, imprisonment, disbarment from participating in federal grants or contracts, and/or any other remedy available by law.

I certify that the assurances provided are true and accurate to the best of my knowledge.

Elections or other selections of new officials will not relieve the grantee entity of its obligations under this grant.

Signature of Law Enforcement Executive (or Official with Programmatic Authority, as applicable)

Date

Signature of Government Executive (or Official with Financial Authority, as applicable)

Date



Appendix B – Certifications

Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; Drug-Free Workplace Requirements Coordination with Affected Agencies.

Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; Drug-Free Workplace Requirements Coordination with Affected Agencies.

Although the Department of Justice has made every effort to simplify the application process, other provisions of federal law require us to seek your agency's certification regarding certain matters. Applicants should read the regulations cited below and the instructions for certification included in the regulations to understand the requirements and whether they apply to a particular applicant. Signing this form complies with certification requirements under 28 CFR Part 69, "New Restrictions on Lobbying," 28 CFR Part 67, "Government-Wide Debarment and Suspension (Nonprocurement)", 28 CFR Part 83 Government-Wide Requirements for Drug-Free Workplace (Grants)," and the coordination requirements of the Public Safety Partnership and Community Policing Act of 1994. The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Justice determines to award the covered grant.

1. Lobbying

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

A. No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with the making of any federal grant; the entering into of any cooperative agreement; and the extension, continuation, renewal, amendment or modification of any federal grant or cooperative agreement;

B. If any funds other than federal appropriated funds have been paid or will be paid to 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 grant or cooperative agreement, the undersigned shall complete and submit Standard Form - LLL, "Disclosure of Lobbying Activities," in accordance with its instructions;

C. The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all sub-recipients shall certify and disclose accordingly.

2. Debarment, Suspension and Other Responsibility Matters (Direct Recipient)

As required by Executive Order 12549, Debarment and Suspension, and implemented at 28 CFR Part 67, for prospective participants in primary covered transactions, as defined at 28 CFR Part 67, Section 67.440 -

A. The applicant certifies that it and its principals:

(i) Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of federal benefits by a state or federal court, or voluntarily excluded from covered transactions by any federal department or agency;

(ii) Have not within a three-year period preceding this application been convicted of or had a civil 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) or private agreement or transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, tax evasion, or receiving stolen property, making false claims, or obstruction of justice, or commission of any offense indicating a lack of business integrity or business honesty that seriously affects your present responsibility.

(iii) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (A)(ii) of this certification; and

(iv) Have not within a three-year period preceding this application had one or more public transactions (federal, state or local) terminated for cause or default; and

B. Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

3. Drug-Free Workplace (Grantees Other Than Individuals)

As required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 83, for grantees, as defined at 28 CFR Part 83, Sections 83 and 83.510 -

A. The applicant certifies that it will, or will continue to, provide a



drug-free workplace by:

- (i) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (ii) Establishing an on-going drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug-abuse violations occurring in the workplace;
- (iii) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (i);
- (iv) Notifying the employee in the statement required by paragraph (i) that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
 - (v) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (iv)(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to:

COPS Office, 1100 Vermont Ave., NW, Washington, D.C. 20530. Notice shall include the identification number(s) of each affected grant.

- (vi) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (iv)(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state or local health, law enforcement or other appropriate agency;
 - (vii) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (i), (ii), (iii), (iv), (v) and (vi).

B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of performance (street address, city, county, state, zip code)

Check if there are workplaces on file that are not identified here.

4. Coordination

The Public Safety Partnership and Community Policing Act of 1994 requires applicants to certify that there has been appropriate coordination with all agencies that may be affected by the applicant's grant proposal if approved. Affected agencies may include, among others, the Office of the United States Attorney, state or local prosecutors, or correctional agencies. The applicant certifies that there has been appropriate coordination with all affected agencies. Grantee Agency Name and Address:

_____ Grantee IRS/ Vendor Number: _____

False statements or claims made in connection with COPS grants (including cooperative agreements) may result in fines, imprisonment, disbarment from participating in federal grants or contracts, and/or any other remedy available by law.

I certify that the assurances provided are true and accurate to the best of my knowledge.

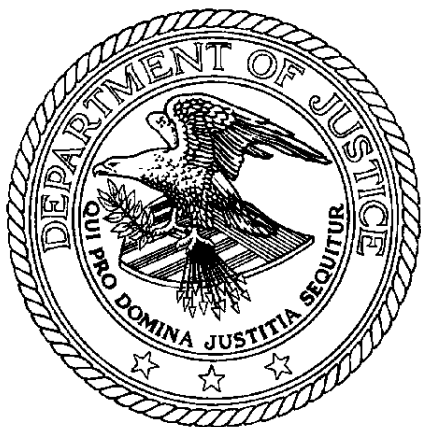
Elections or other selections of new officials will not relieve the grantee entity of its obligations under this grant.

Typed Name and Title of Law Enforcement Executive (or Official with Programmatic Authority, as applicable):

Signature: _____ Date: _____

Typed Name and Title of Government Executive (or Official with Financial Authority, as applicable):

Signature: _____ Date: _____



FOR MORE INFORMATION:

U.S. Department of Justice
Office of Community Oriented Policing Services
1100 Vermont Avenue, N.W.
Washington, D.C. 20530

To obtain details on COPS programs, call the
U.S. Department of Justice Response Center at 800.421.6770

Visit the COPS Online at the address listed below.

e02042207

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www.cops.usdoj.gov