



COPS

COMMUNITY ORIENTED POLICING SERVICES
U.S. DEPARTMENT OF JUSTICE

COPS in Schools

COPS in Schools

Grant Owner's Manual





COPS in Schools Grant Owner's Manual

The following manual was created to assist COPS in Schools (CIS) grantees with the administrative and financial matters associated with the grant.

For more information about your agency's CIS 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 in Schools (CIS) grant provides funding directly to local, state and tribal jurisdictions for the hiring and deployment of new, additional, career law enforcement officer position(s) in and around primary and secondary schools.

The CIS program was designed to provide assistance to law enforcement agencies to build collaborative relationships with schools and to use community policing efforts to help combat violence and reduce the fear of crime in the schools by deploying officers as school resource officers (SROs).

This CIS 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 CIS grantees clearly understand and meet the requirements of their grants and the CIS program. Please review the manual carefully, because the failure to follow grant requirements can have serious ramifications. 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.



I. Grant Acceptance, Terms, and Conditions

To officially accept and begin your COPS in Schools (CIS) grant, your agency must review, sign, and return the original award document to:

COPS in Schools Control Desk (7th Floor)
U.S. Department of Justice
Office of Community Oriented Policing Services (COPS)
1100 Vermont Ave., N.W.
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 the originals of both the law enforcement and government executives—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 (listed on the back of the document), 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.**

Your grant number is in the following format: 2003-SHWX-0000 for grants awarded in FY 2003, 2004-SHWX-0000 for grants awarded in FY 2004, 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) readily available when corresponding with the COPS Office.



What is a Revised Budget Summary?

In a small number of cases, 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 and the agency is required to meet a local match. The final grant amount on this document may differ from the estimated amount on your agency's original 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, as your agency is agreeing to use CIS 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 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 commonly asked questions.

In special cases, a grant condition that your agency may receive will prevent drawdown of or access to federal funds until the condition 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 CIS 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 COPS in Schools 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 CIS grant, your agency agrees to abide by the following grant conditions:

1. ALLOWABLE COSTS

The funding under this project is for the payment of entry-level salaries and approved fringe benefits over three years (for a total of 36 months of funding) for new, additional sworn career law enforcement officer positions, hired on or after the award start date. The financial clearance memorandum reflects the "allowable costs" of the grant; in other words, these are the specific items that your agency is allowed to fund with the CIS award (including the local match, if required). Using CIS funds for anything not identified in the financial clearance memorandum is unallowable (unless your agency receives a formal grant modification, as discussed below). In addition, any portion of salaries and/or benefits above entry-level must be paid by the grant recipient, in addition to the local match (if required).



If your agency has elected to deploy a veteran officer into the schools as a result of the CIS grant, then your agency is only eligible to use the federal funds from your CIS grant once the veteran officer's vacant position has been backfilled with the new, additional, sworn career law enforcement officer. In this scenario, the 36-month grant period does not begin when the veteran officer is deployed into the school, but rather once the new, additional, sworn entry-level position has been filled, thereby backfilling the veteran's vacated position. Funds from this grant may only be used to pay for the salary and fringe benefits of the new, additional sworn career law enforcement officer position, and may not be used to cover costs of the veteran officer deployed into the schools.

Only actual costs incurred during the 36-month 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 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 grant period will be de-obligated according to federal regulations during the grant closeout process, and should not be spent by the agency.

Occasionally, a change in your agency's fiscal situation or law enforcement needs may require a change in the amount of your CIS award. The COPS Office cannot increase the amount of your CIS award, but may reduce the award amount to reflect changes in your local needs. Some examples of this may include, but are not limited to, agencies that request to reduce the number of positions awarded due to local financial matters or agencies that wish to change full-time positions to part-time positions in order to better meet their local law enforcement needs. Should future changes occur that require a change to the allowable costs, then you should contact the COPS Office to seek a modification to your grant.

Modifications are evaluated on a case-by-case basis. All modification requests must be submitted in writing for approval by the COPS Office prior to implementation. Additionally, the federal share of allowable costs is limited to the amount awarded and may not be increased at any time during the grant period. Similarly, the amount awarded per position cannot be increased at any time during the grant period once awarded, even if the overall project cost is reduced by the modification request.



Why This Condition:

The COPS in Schools program funds may only be used to pay for entry-level salaries and benefits for the hiring or rehiring of new, additional career law enforcement officers who are hired on or after the award start date.

Also, under federal regulations, requests to change or alter your grant award 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:

Refer carefully to your financial clearance memorandum (and revised budget summary, if applicable) for a list of the approved, allowable costs. Your agency is agreeing to use CIS funds only on these costs.

You must maintain records showing that you spent CIS funds only on allowable costs. For example, since salaries must be spent on a newly hired or rehired sworn law enforcement officer, you must maintain documentation identifying when the CIS-funded officer was hired. Since salaries covered by CIS must be based on your agency's standard entry-level salary and benefits package, you should maintain a copy of the applicable laws or rules governing hiring by your agency and records reflecting the agency's entry-level salary and benefits package. Salary and fringe benefit payments must be based on payroll records supported by time and attendance records or their equivalent. A further description of the types of records your agency must maintain are described in Section IV of this manual.

Overtime, training, weapons, communication equipment and vehicles cannot be funded with your CIS 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 a state certified academy training period if that is the standard policy of your agency.

If at any time your agency wishes to modify the grant award, you must submit a written request on your agency's letterhead referencing the grant number, the proposed changes, details of why the change is needed, etc. [For further information and complete requirements, contact your Grant Program Specialist.] If the request is approved,



your agency must receive this approval in writing before implementing the proposed changes to your grant award. The approval letter will be accompanied by a modified award document reflecting the approved changes. To officially accept the modification, your agency must sign the modified award document and return it to the COPS Office at the following address:

**COPS in Schools Control Desk (7th Floor)
U.S. Department of Justice
Office of Community Oriented Policing Services (COPS)
1100 Vermont Ave., N.W.
Washington, D.C. 20530**

2. SUPPLEMENTING, NOT SUPPLANTING

CIS grant funds must be used to hire new, additional career sworn law enforcement officer position(s) over and above the total number of sworn officer position(s) that would be funded by the agency in the absence of the grant. This includes other school resource officers or other sworn officers assigned to the schools prior to receiving the CIS grant, as well as all other sworn officer positions funded by your agency. CIS funds may also be used to rehire positions that were laid off prior to receiving the grant as the result of budget reductions if, and only if, the positions were laid off for reasons unrelated to the anticipation of receiving a COPS grant award. 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 CIS 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) which otherwise would be spent on law enforcement purposes in the absence of the COPS grant.

What You Should Do:

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

- Each officer position hired under CIS is newly hired on or after your grant award start date. Your agency may not fill the CIS 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. For example, agencies may promote locally funded part-



time positions to fill full-time COPS-funded positions, but only if they (a) hire new, additional part-time officers with local funds to backfill the resulting vacancies before using COPS funds for the full-time positions, and (b) first obtain written authorization from the COPS Office.

- The officer(s) that your agency hires must bring your sworn force to a number over and above the number of officer positions that were locally budgeted (funded) as of the date of your CIS application, plus any additional officer positions budgeted with state or local funds during the grant period.
- During the life of this and any other COPS 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 committed to hiring other new officers.
- Your agency must take positive and timely steps consistent with your agency's standard operating procedures to fill any locally-funded vacancies that were created on or after your grant award date due to retirement, resignation or other reasons with new locally-funded officers. If your agency has questions about how to fill locally-funded vacancies and COPS-funded positions at the same time, please contact your COPS Grant Program Specialist for specific advice based on your agency's particular circumstances.
- You do not reduce your locally, state, or BIA-funded sworn officer positions as a result of receiving CIS funds. If your agency faces budget cuts or other factors that could reduce your total number of (non-COPS) sworn officer positions during the life of the grant, or if you are unable to fill officer vacancies within your usual time frame, you may contact the COPS Office to request a review of your specific circumstances and related guidance to ensure continued compliance with the nonsupplanting requirement.

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 CIS 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 all reasons why locally-funded vacancies were not filled on a timely basis pursuant to standard procedures or the specific reasons for each reduction of locally (or state or BIA) funded sworn officer positions; or other records described in Section IV of this manual.



3. RETENTION

This grant condition has two requirements, depending on whether you are in the grant period or the grant period has expired. First, during the 36 months of funding, your agency must plan to retain each CIS-funded officer position after CIS funding for each position is completed. Second, upon the conclusion of the 36 months of CIS funding for each position, your agency must retain each CIS officer position for at least one full local budget cycle, referred to as the retention period. Under the COPS in Schools program, the retention requirement applies to the additional officer position(s) hired as the result of the CIS award. This means that, as the 36 months of funding is completed for each CIS position, that additional position must be retained by your agency above and beyond the number of officer positions that the agency would fund in the absence of the grant. You cannot satisfy the retention requirement by using the CIS positions to fill vacancies from attrition.

Please note that CIS grant funding corresponds to the officer **position(s)** awarded and not the individual filling the grant position(s). Therefore, if for any reason the officer originally filling a position funded by the CIS grant leaves your department during the retention period, your agency is required to take timely steps to back-fill that position with a newly hired officer until the retention period is completed.

Why This Condition:

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

What You Should Do:

First, at the time of application, your agency submitted a signed retention plan or retention plan certification form that outlined your agency's commitment to plan to retain all additional COPS-funded positions and maintain all locally-funded position(s) for one local budget cycle following the 36-month grant period. The position(s) must be retained using state, local, tribal, or other non-COPS funding for a minimum of one full local budget cycle following the conclusion of the grant period. Your agency is not permitted to use attrition to meet the retention requirement. During the 36-month funding period, your agency should ensure that it is planning to retain the positions when the grant ends.

Second, as the 36-month funding period expires for each position, your agency must retain each position for one local budget cycle with the non-COPS funds. You must maintain records recording when the grant expired for each period, demonstrating that each position was retained above and beyond the number of officer positions that the agency would have otherwise funded, and showing that the position was not retained by attrition.

Please be aware that the legal applicant for the grant is ultimately responsible for the retention of the officer position(s) should the partnering school(s) not provide the retention funding, even if your agency's retention plan identified the partnering school(s) as the planned source of retention funding.

If at any point during the grant or during the retention period, your agency finds itself in financial or other circumstances that could prevent you from retaining the additional positions, you must contact your Grant Program Specialist promptly for further review by calling the U.S. Department of Justice Response Center at 800.421.6770.

4. COMMUNITY POLICING

Your agency is required to implement community policing activities as identified in your CIS grant application, focusing on school resource officer duties and related community policing strategies.

The COPS Office requires that the officer positions deployed as a direct result of receiving a CIS grant spend a minimum of 75 percent of their time in and around primary and secondary schools working on youth-related activities. Under the COPS in Schools program, there must be an increase in the level of community policing activities that are being performed in and around primary or secondary schools in your jurisdiction as a result of the grant. Thus, the time commitment of CIS funded officers must be above and beyond the amount of time that your agency devoted to the schools before receiving CIS funding.

Why This Condition:

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 the schools and the communities that surround the schools. 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 or school crime-related problems.



In order to meet the guidelines established by the COPS statutory definition of a school resource officer (SRO), agencies must dedicate a significant portion of time to primary and secondary schools. To effectively address crime, violence, and other disorder problems using a school resource officer deployed in community policing, the COPS Office requires each CIS position to work in and around primary and secondary schools for a minimum average of nine months per year, or 75 percent of the officer's time.

What You Should Do:

Your agency identified its planned CIS community policing activities in your CIS grant application. Any subsequent changes to the community policing activities that were listed in your CIS application should be addressed in your progress reports and/or should be provided to the COPS Office in writing before implementation. Your agency is not limited to those community policing activities outlined in your application; community policing activities may be amended as needed to meet your agency's and school partner's changing law enforcement needs. However, significant changes to the community policing activities identified in your CIS 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 CIS application. Additionally, changes to the community policing strategies may be denied by the COPS Office if the scope of the activities would have prevented your agency from originally being awarded under the CIS program. Therefore, any changes must still comply with the basic requirement that all additional CIS officers must spend at least 75 percent of their time in and around the primary or secondary schools performing school resource officer functions.

Your agency should document the amount of time the school resource officer spends in the schools to ensure that the 75 percent requirement is being met. Tracking the deployment of SROs into the schools may include daily, monthly, bi-annual or annual reporting. The 75 percent requirement may also be completed based on the full 36-month grant period.

This time commitment must be above and beyond the amount of time that the agency devoted to the schools prior to receiving CIS funding. Further clarification of this 75 percent rule scenario is outlined in the following two examples below. For additional information, please contact your COPS Grant Program Specialist through the U.S. Department of Justice Response Center at 800.421.6770.



Example 1

Pre-grant SRO commitment:

Five (5) hours per week, 12 months per year

CIS grant award:

One (1) additional full-time officer position. Department must hire a new full-time officer after the grant award start date, and then will meet the 75 percent SRO deployment requirement by deploying an additional officer into the schools for 30 hours per week, 12 months per year.

Net result:

35 hours per week in the schools (five locally-funded hours per week in the schools + 30 CIS-funded hours per week in the schools).

- One officer who works the 30 hours per week required by the CIS grant, and one or more locally-funded officers who continue to work the five hours per week that the department committed to the schools prior to the grant award.

OR

- One officer who works 35 hours per week, year round in the schools (five hours per week that were committed to the schools prior to funding, and the additional 30 hours per week necessary to meet the requirements of the grant).

Example 2

Pre-grant SRO commitment:

20 hours per week, 12 months per year

CIS Grant Award:

One (1) additional full-time officer position. Department must hire a new full-time officer after the grant award start date and then will meet the 75 percent requirement by deploying an additional officer into the schools for 30 hours per week, 12 months per year.

Net result:

Fifty (50) hours per week in the schools (20 locally-funded hours + 30 CIS-funded hours per week).

[Because 50 hours exceeds a regular 40-hour work week, these hours must be worked by multiple officer positions: one (1) who works the 30 hours per week required by the CIS grant, and one (1) or more locally-funded officers who continue to work the 20 hours per week that the Department committed to the schools prior to the grant award.]



5. COPS IN SCHOOLS TRAINING CONDITION

CIS grantees are required to send each school resource officer(s) deployed into a partner school(s) or school district as a result of receiving a COPS in Schools grant, and one designated school administrator for each awarded grant, to one COPS in Schools training workshop. The COPS Office will be the sole provider of this training workshop. This condition must be completed prior to the end of your agency's 36 months of grant funding for each officer position awarded. **No-cost grant extensions will not be given for the sole purpose of providing additional time to complete this training requirement.** Therefore, all required participants must attend the training before the end of the grant period. Your agency submitted a signed form acknowledging and accepting this requirement at the time of application or with the signed award document upon receiving a CIS grant.

Why this Condition:

This training workshop is intended not only to provide information on various important school safety topics, but is also designed to promote effective collaboration and partnerships among the school, law enforcement agency and other entities. The COPS Office will pay for travel, lodging and per diem for the required participants up to a maximum of \$1,200 per participant.

What You Should Do:

Your agency will receive additional information regarding this mandatory training. All CIS-funded school resource officers and one designated school administrator from each grant are required to attend the training prior to the end of the 36-month grant period, unless an extension has been authorized by the COPS Office. [It should be noted that extensions of the grant period will not be given to agencies solely to provide more time for agencies to attend the required training workshop; extensions will only be granted for the purposes of completing the 36-month hiring period and/or to draw down funding for allowable costs incurred.]

The school representative must be an administrator with decision-making authority who is directly involved with the CIS program/school resource officer(s). Due to space limitations, only one school administrator per grant will be permitted to attend the training workshop, regardless of the number of school partners. Similarly, because of space limitations, we regret that other participants will not be permitted to attend this training, even at their own expense.



6. CONTRACTS WITH OTHER JURISDICTIONS

- A. Agencies that provide law enforcement services to another jurisdiction through a contract must demonstrate 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 legal applicant listed in the application (the government entity that applies for the grant).

Why This Condition:

This grant must benefit the community of the legal applicant. Therefore, the agency must use the CIS grant funding to benefit the legal applicant's 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 CIS cannot be contracted by your agency to other agencies unless they will benefit the population served by the legal applicant. For example, a sheriff's department shall not contract the legal applicant's CIS position to a neighboring jurisdiction's school(s). However, if a county sheriff's department directly provides law enforcement services to several towns within its county, then the department may contract with one or more of those towns to provide the school(s) with the services of a CIS officer.

- B. Municipalities that do not have their own law enforcement agencies, but contract for law enforcement services, may apply for a CIS grant to supplement their locally-funded contract with additional officers. The additional CIS-funded officers must exclusively service the legal applicant and its partner school(s).

Why This Condition:

If a legal applicant decides to use its CIS grant to contract for the services of an officer from another jurisdiction's police department or sheriff's office, the grantee must ensure that the activities of the officer(s) comply with the terms and conditions of its CIS grant.

What You Should Do:

If your agency will contract with another department to fill the COPS-funded CIS position(s), you must ensure that the contract is in accordance with the terms and conditions of your CIS grant.



- C. Schools or school districts may not contract directly for law enforcement services and/or serve as the legal applicant unless they have the legal authority to maintain a school/school district law enforcement agency.

Why This Condition:

Schools or school districts that do not have the authority to maintain a sworn, career law enforcement agency may not apply directly for a CIS grant. Schools in these positions are not considered to have the authority to manage the law enforcement responsibilities imposed upon the legal applicant.

What You Should Do:

Schools or school districts that do not have the authority to maintain a sworn law enforcement agency must partner with the local government and law enforcement agency in order to apply for school resource officers under the CIS program. In this scenario, either the local government or the law enforcement agency must apply for the grant.

However, those schools or school districts that already have the authority to maintain a sworn law enforcement agency may apply directly for funding under the CIS program. In this scenario, the school district would act as the legal applicant and apply as the government agency, while the school district police department would apply as the law enforcement agency. Additionally, those that do not already have a school law enforcement agency but do have the state and local legal authority to start an agency may apply by submitting the additional "Start-up" questionnaire. In all cases, the legal applicant will be responsible for complying with all CIS grant requirements.

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 your CIS application.

Why This Condition:

Although the U.S. Department of Justice has made every effort to simplify the process of applying for and receiving grants, there are a number of important laws that attach to receiving a federal grant, including some laws that require your agency's certification. Most of these laws apply to all grants provided by the federal government.



What You Should Do:

Each agency signed the Assurances and Certifications forms at the time of application for the CIS program funding. Your agency is responsible for reviewing these documents and ensuring that the terms 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 at the U.S. Department of Justice Response Center 800.421.6770.

8. REPORTS

To assist the COPS Office in the monitoring of your award and tracking the progress of your CIS grant, your agency will be responsible for submitting (1) periodic programmatic progress reports; (2) quarterly Financial Status Reports, and (3) an annual survey on your hiring status. As those reports become due, your COPS Grant Program Specialist and Staff Accountant can assist you with their completion.

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 the reporting requirements associated with CIS grants. These reports are discussed extensively in Section VI of this manual.

9. EXTENSIONS

The COPS Office does not offer extensions that provide additional funding for your CIS award. However, the COPS Office does offer extensions of time to complete your grant, which are referred to as no-cost extensions. A no-cost time extension will be offered during the last quarter of the grant period, which provides your agency with additional time to complete the 36-month grant period and/or to draw down funding for allowable costs incurred during the grant period.



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 funding may be suspended or terminated at the end of the original grant period. However, the COPS Office seeks to accommodate reasonable requests for additional time to complete a grant, due to justifiable delays in filling positions or other delays in implementing the grant.

What You Should Do:

The COPS Office will mail an Extension Request Worksheet to your agency during the last quarter of your agency's CIS grant. Please complete this worksheet if your agency needs an extension of time to complete the grant and mail or fax it to:

**COPS in Schools Control Desk (7th Floor)
U. S. Department of Justice
Office of Community Oriented Policing Services (COPS)
1100 Vermont Ave., N.W.
Washington, D.C. 20530**

Fax: 202.514.9407

If you do not receive or cannot locate this worksheet before the end date of the grant, please submit a written extension request on department letterhead to the COPS Office address/fax number listed above. Extension requests will only be processed during the last quarter of the grant period and early submissions will not be considered until that time.

When submitting an extension request on department letterhead, please propose a new end date that your agency anticipates it will need to complete the 36-month funding requirement. Extension requests over 18 months will be approved on a case-by-case basis. When requesting an extension over 18 months your agency is required to provide additional information that must address: 1) whether all positions have been filled to date; 2) a summation of the reasons for delay that your agency encountered in implementing the grant so far; 3) how your agency plans to remedy those delays in the future; and 4) the anticipated hire dates and release dates of the position(s) of the grant to aid in determining the extension necessary to meet the grant requirements. Additionally, if the position(s) covered by the grant are currently vacant, then your agency should provide a timeline for filling the vacancies, outlining the steps currently being taken to recruit and backfill the vacant position(s).

10. GRANT MONITORING ACTIVITIES

The COPS Office conducts various kinds of monitoring to ensure compliance with all grant requirements, assess the implementation of community policing, and provide technical assistance to grantees. To assist in monitoring the grants, the grantee agrees to allow the Department of Justice or the Comptroller General access to and the right to examine records and documents related to the grant. The following monitoring activities are routine during the grant period, and may occur up to three years following closeout of the grant. These functions, and others, may require the grantee to produce grant-related documentation and other materials. The grantee agrees to cooperate with any such requests for information.

Why This Condition:

The Public Safety Partnership and Community Policing Act of 1994 states that grants shall be monitored for compliance and there shall be access to any pertinent records in order to conduct such monitoring. The COPS Office monitors grantees to determine if they are adhering to COPS grant terms and conditions through a variety of methods.

What You Should Do:

Your agency may be required to accommodate routine and non-routine monitoring 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 monitoring methods are:

- 1) Site Visits – An on-site review would be conducted at your agency. This review is generally performed over a one or two day period and also provides an opportunity for agency representatives to seek assistance on any grant implementation related issues or problems. A report is written following the visit and your agency would 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. Your agency would be contacted at the start of this review and COPS staff would work with your agency to correct any grant violations through telephone, fax, or written correspondence with your agency.



- 3) Complaint Review – The COPS Office responds to all grant-related complaints from citizens, labor associations, media, and other sources. Written complaints are reviewed by the COPS Office Monitoring Division, and may result in a further review of your agency's grants to determine compliance with grant terms and conditions.

Grantees are responsible for remedying any grant violation that is identified through these or other monitoring activities. Remedies may include, but are not limited to, grant suspension, repaying misused grant funds, voluntary withdrawal from or involuntary termination of remaining grant funds, and bars from receiving future COPS funding. The failure to remedy grant violations can have serious legal ramifications for your agency. To avoid findings of non-compliance, 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 and produce all relevant documentation that may demonstrate grant compliance. For more information, please contact the COPS Monitoring Division at 800.421.6770 or 202.514.9202.

The COPS Office also conducts evaluations of its programs in furtherance of the purposes of the Public Safety Partnership and Community Policing Act of 1994. Your agency agrees to cooperate with any evaluations conducted or sponsored by the COPS Office.

11. GRANT OWNER'S MANUAL, REGULATIONS AND OMB CIRCULARS

The grantee agrees to abide by the terms, conditions and regulations as found in this COPS In Schools Grant Owner's Manual; by the terms of the Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, (28 C.F.R. Part 66 or Part 70, as applicable); by the terms of the requirements of OMB Circulars A-21 or A-87 (governing cost principles) and A-133 (governing audits); by all applicable provisions of the Omnibus Crime Control and Safe Streets Act of 1968, as amended; and by all other applicable laws, orders, regulations or circulars.

Why This Condition:

This manual has been designed to inform you of the policies, procedures and regulations that apply to your grant and is based on the documents listed above to assist in summarizing administrative requirements for COPS grants. Your agency is responsible for understanding and complying with the information and rules contained in this manual. More detailed guidance can be requested



through your Grant Program Specialist and is discussed in more detail in the COPS Grant Monitoring Standards and Guidelines for Hiring and Redeployment, which can be obtained on the COPS Office website or by contacting the U.S. Department of Justice Response Center at 800.421.6770.

What You Should Do:

Please read the entire CIS Grant Owner's Manual carefully prior to signing the grant award document. If you have any questions, please contact your 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 as indicated by the documents listed above.

12. 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 the Office of Civil Rights 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.](#)

13. 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 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 for employment. The provisions of this law apply to employers regardless of whether they receive federal grant funding.

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.

Accepting the Grant Award

After you have reviewed the conditions of your CIS award and your agency agrees with those conditions, you are ready to accept the award. The Director of the COPS Office has signed the award document indicating approval of your agency's grant application, an obligation of federal funds to your organization, and the COPS Office's 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** (i.e., the law enforcement and government executives) must sign the award document and return the **original** copy to:

COPS in Schools Control Desk (7th Floor)
U. S. Department of Justice
Office of Community Oriented Policing Services (COPS)
1100 Vermont Ave., N.W.
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 will not 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 or Sheriff) and the top government executive (e.g., Mayor or County Commissioner) sign the award document. Typically, these are the same executives who signed the CIS application documents (if 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 grant materials 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 original signed award document within the 90-day award acceptance period may result



in your CIS grant being withdrawn and the funds being deobligated. If your department requires additional time to sign the award document beyond the 90-day time frame, please submit a written request to your Grant Program Specialist explaining the circumstances that prevent signing the award within the 90-day period and identifying when the award will be signed. 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 our agency needs 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:

- Reduction of the number of officers to be hired under your CIS grant.
- Significant changes in your community policing plan in and around the primary and secondary schools.
- Salary and benefit changes.
- Changes in part-time or full-time employment.
- Changes to your retention plan.
- 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 significant change requests for your CIS grant should be sent, in writing, to your Grant Program Specialist. Upon reviewing your request, COPS may contact you for additional information or clarification, or our office may deny the requested change.

What if our agency no longer wishes 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 funds have been used.



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

It is important to adhere to all of the grant's terms and conditions as outlined in this Grant Owner's Manual, as well as to maintain documents supporting your grant implementation and expenditures and to obtain prior authorization for grant activities when applicable. Please be advised that the COPS Office has the right to sanction grantees or terminate grant projects when there is reason to believe that grantees:

- Are not substantially complying with the requirements of the Act, the guidelines or with other provisions of federal law;
- Are failing to make satisfactory progress toward the goals or strategies in the approved application;
- Are not adhering to grant agreement 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 reports in a timely manner;
- Are filing false statements or certifications in connection with an application, periodic reports or other grant related documents;
- Are providing other good cause for sanctions or termination as determined by the COPS Office.

In these instances, the COPS Office may:

- Temporarily withhold payments pending correction of the situation ;
- Disallow all or part of the cost of the activity or action not in compliance;
- Wholly or partly suspend or terminate the grant award;
- Require repayment of some or all of the grant funds 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.

In the event that sanctions are imposed or a grant is terminated, your agency will be notified in writing of our decision and the reason(s) for that decision.



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 to the federal government.



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 currently only one method of payment available to you for accessing your 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 CIS 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-related 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, Accounting Division, 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 and is listed on the award document) 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, 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 should 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 filled out 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). Then, 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 a new ACH Vendor/Miscellaneous Payment (SF 3881) enrollment form with each new grant awarded. If you have any questions, please call 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, your agency is required to begin submitting quarterly Financial Status Reports (FSRs) using a Standard Form 269-A (SF-269A) beginning in the quarter of the grant start date. This report reflects the actual monies spent and unliquidated obligations incurred by your agency. You will not be able to make draw downs from your grant account if the SF-269A for the most recent reporting quarter 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 an SF-269A even if you have not spent any money or incurred any costs during a reporting period.

SF-269A Reporting Quarters	Due Date
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 02-01-03 and the current date is 04-15-03, then your first SF-269A would be due no later than 05-15-03 and would cover the period 02-01-03 (award start date) through 03-31-03 (end date of the most recent reporting quarter). This SF-269A must be on file with the COPS Office so that you can successfully request 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 the Grant Owner's Manual entitled "Reports."

Please be advised that the information reflected on the FSR must reconcile with the amount of funds that your agency has drawn down and must reflect the accurate local match contribution, if applicable.

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 approved advances discussed 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, as long as the reimbursements cover only actual expenditures of allowable salary and benefit costs for CIS-funded officers.

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
- 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 (If Applicable)

The COPS in Schools program provides up to \$125,000 for the entry-level salary and approved fringe benefits for a newly hired law enforcement officer over a three-year grant period. Any costs associated with the approved salaries and fringe benefits above and beyond the \$125,000 dollar threshold are the sole responsibility of the local agency. 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. COPS in Schools grants are not eligible for waivers of the local match.

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 which specifically authorize their use as matching funds, such as the Housing and Community Development Act of 1974 or the Equitable Sharing Program.
- Funds contributed by private sources.

When and how must the match be made?

Matching contributions should be applied during the life of your grant in accordance with the budget information worksheet submitted by your agency at the time of application. If a correction was made to your budget during review by the COPS Finance Division, you may have received a revised budget summary along with your award document and financial clearance memorandum. In this instance, you must pay your local match as it is reflected on the revised budget summary. If you have any questions about adjusting your match from what is stated in your approved revised budget summary, 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 match, if applicable. These records should clearly show the source of the match, the amount of the match, and when the match was contributed. Such records must be produced in the event of an audit or site visit. In addition, grantees are required to report their local match on the quarterly financial status report SF-269A under "line B."



IV. Financial Record Maintenance

Under the CIS 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 must 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 organizations.

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 CIS grant conditions; and
- 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 CIS grant. Your accounting records should contain information showing expenditures under the grant and must be supported by items such as payrolls, time and attendance records, canceled checks or similar documents.

Your agency must adequately safeguard grant funds and make sure that they are used only for authorized purposes. Furthermore, your agency will be required to repay funds expended on unallowable costs.

How long must documents be kept?

All financial records, including payroll, time and attendance records, canceled checks and similar documents associated with your COPS CIS 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.

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 federal grant, funds received under one project may not be used to support another project without specific written authorization 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 a total amount of federal awards equal to or in excess of \$300,000 in a fiscal year is required to have an SAA audit for that fiscal year. 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 Federal Cognizant Agency (see Glossary of Terms for definition), your Single Audit Act reports should be sent to the U.S. Department of Justice Clearinghouse at:

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



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 auditors in the conduct of OIG audits. 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 U.S. Department of Justice Response Center at 800.421.6770. Questions and comments regarding the administration of your CIS grant, not specifically related to an audit, should be referred to your Grant Program Specialist.

VI. Reports

Your agency will be asked to provide three types of reports for this grant: (1) periodic programmatic progress reports; (2) quarterly Financial Status Reports; and (3) an annual survey about your hiring status. **Failure to submit complete reports in a timely manner may result in the suspension and possible termination of your agency's COPS grant funding or other remedial actions.**

1. COPS in Schools Progress Reports

You are required to respond to this type of report when it is sent to you. It may be requested annually or periodically during the grant. The programmatic progress report is typically mailed in December or January of each year and must be completed and returned by mid-February, or within 45 days of the initial mailing (the exact return date will be specified in the report). Information will be gathered on your agency's police force demographics, baseline sworn force levels, and community policing activities in and around primary and secondary schools.

2. 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. The information in the Form 269 should reconcile with the amount of funds drawn down by your agency for this grant, and should also reflect the appropriate amount of local match (if applicable).

How do we file Financial Status Reports?

The FSR is due to the COPS Office no later than 45 calendar days following each calendar quarter. A chart showing the reporting quarter end dates and due dates is provided in Section II of this manual, entitled "Setting Up Your Account." A Helpful Hints Guide for Completing FSRs is available through COPS Online at 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:

COPS Finance Division Control Desk (3rd floor)
U.S. Department of Justice
Office of Community Oriented Policing Services (COPS)
1100 Vermont Ave., N.W.
Washington, D.C. 20530

3. Surveys About Hiring

The COPS Office will contact your agency by phone, fax, or letter approximately once a year to determine your grant progress, number of officers hired and deployed into school resource officer roles, and a timetable for when future hiring may occur.



VII. When the Grant Period Has Ended

At the end of your agency's CIS grant period, the COPS Office is responsible for the "close out" of your grant. As part of this process, the COPS Office requires documentation demonstrating that your agency has met and fulfilled all of the programmatic and financial requirements of the grant.

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. These reports will be very similar to the reports discussed in Section VI.

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 incurred costs for the 36-month grant period that an officer was deployed in the school(s) and the grant position was occupied. Also, it should reconcile with the amount of funds drawn down by your agency and reflect the appropriate local match contribution (if applicable).

When should all of the grant monies be spent?

Grant funds 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 committed 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 could have excess funds remaining in your account following the full 36-month grant implementation period based on overestimates of salaries and benefits for the second and third years of 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 unobligated or unspent funds will be deobligated from the award amount.



Final Progress Report

If necessary, your agency will receive a Final Progress Report from the COPS Office. This will act as your agency's Final Progress Report on the grant and should only be filled out by agencies that completed the 36-month grant period.

Retention

At the conclusion of federal funding, your agency should implement its plan/retention plan certification form that was submitted at the time of application that committed to retain the additional COPS-funded officer position(s) as required by Grant Condition #3 (discussed on p. 8 of this manual). As a reminder, the legal applicant for the grant is ultimately responsible for the retention of the officer positions(s) should the partnering school(s) not provide the retention funding, even if your agency's retention plan identified the partnering school(s) as the planned source of retention funding.

If you have any questions regarding the retention requirement, please contact your Grant Program Specialist at the U.S. Department of Justice Response Center at 800.421.6770.

VIII. Conclusion

Contact Points to Obtain Technical Assistance and Report Non-Compliance

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 must 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 non-compliance 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 non-compliance (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](#).
- 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 Training and Technical Assistance Division at 800.421.6770.

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 in Schools program and the materials we are developing for its administration. If you have specific comments regarding this manual, please send them to:

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

We will review your comments and make revisions as appropriate.

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 CIS grant program. The COPS in Schools program funds entry-level salaries and approved fringe benefits over the three year grant period for new, additional, or rehired sworn officer positions to work in and around primary or secondary schools on youth-related activities. 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 (other than 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), 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, County Commissioner, 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 in writing.

Award Start Date

This is the date on or after which your agency is authorized to hire new officer positions under your COPS in Schools 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 CIS grant is 16.710.

COPS Finance Division

The COPS Finance Division handles your agency's financial and budgetary needs related to this CIS 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 COPS Online 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 CIS 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 U.S. Department of Justice Response Center at 800.421.6770.

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.

Federal Cognizant Agency

Your Federal Cognizant Agency is generally the federal agency that provides your agency with the most federal money and is responsible for the oversight of your agency's audits. Your Federal Cognizant 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 Federal Cognizant Agency.

**Grant Number**

The grant number identifies your agency's specific CIS 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 CIS 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 COPS in Schools program, the COPS Office provides up to \$125,000 of the entry-level salary and approved fringe benefits of a newly hired, additional career law enforcement officer position, that has been hired on or after the award start date, over a 36-month grant period. Grantees are responsible for a local match of any salary and benefit costs over \$125,000. No waivers of the local match will be granted for the COPS in Schools program. If required, 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 grant award document is signed by the COPS Director or his/her designated official.

For the grantee, grant funds are "obligated" when monies are spent directly on officer salaries and fringe benefits under the CIS program. The term "encumbrance" is often times 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).



ORI Number (Originating Agency Identifier)

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, CIS grantees are required to retain each additional COPS-funded position awarded, using local funds. Each awarded position must be retained for at least one full local budget cycle 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 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.

**School Resource Officer (SRO)**

The COPS statute defines an SRO as a career law enforcement officer, with sworn authority, deployed in community oriented policing, assigned by the employing police department or agency to work in collaboration with schools and community-based organizations to:

1. address crime and disorder problems, gangs, and drug activities affecting or occurring in or around an elementary or secondary school;
2. develop or expand crime prevention efforts for students;
3. educate likely school-age victims in crime prevention and safety;
4. develop or expand community justice initiatives for students;
5. train students in conflict resolution, restorative justice, and crime awareness;
6. assist in the identification of physical changes in the environment that may reduce crime in or around the school; and
7. assist in developing school policy that addresses crime and recommend procedural changes.

Supplanting

For the purposes of your COPS CIS grant, supplanting means replacing state or local funds which otherwise would have been spent on law enforcement purposes with federal COPS funds. Your agency is prohibited from supplanting throughout the 36-month grant period. This means that your agency may not use COPS funds to pay for any sworn officer positions (full-time, part-time, 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 Indians 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 CIS grant (including any additional SROs or officers previously deployed in the schools). For additional information on supplanting, please review Grant Condition #2 in this manual or contact the U.S. Department of Justice Response Center at 800.421.6770.



X. Appendices

Appendix A

List of Source Documents

Primary Sources:

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

COPS Office Grant Monitoring Standards and Guidelines

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 and Certifications

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 OMB Circulars A-87, A-21, A-122, or the Federal Acquisition Regulations, as applicable (governing cost principles); OMB Circulars A-102 or A-110, as applicable (Uniform Administrative Requirements for Grants and Cooperative Agreements); OMB Circular A-133 (governing audits); the applicable provisions of the Omnibus Crime Control and Safe Streets Act of 1968, as amended; 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 ("EEOP") or EEOP short form (if grantee is required to submit an EEOP 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 EEOP Certification. (Grantees of less than \$25,000 are not subject to the EEOP 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.

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



Certifications

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," and 28 CFR Part 67, "Government-wide Debarment and Suspension (Nonprocurement) and 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 67.510 -

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) transaction or contract under a public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(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 67, Subpart F, for grantees, as defined at 28 CFR Part 67, Sections 67.615 and 67.620 -

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.
 Section 67.630 of the regulations provides that a grantee that is a state may elect to make one certification in each federal fiscal year, a copy of which should be included with each application for Department of Justice funding. States and state agencies may elect to use OJP Form 4061/7.
 Check if the state has elected to complete OJP Form 4061/7.

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 the COPS program, call the
U.S. Department of Justice Response Center at 800.421.6770

Visit COPS Online at the address listed below.

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Updated Date: September 4, 2003



www.cops.usdoj.gov