



State of Wisconsin
Department of Justice
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Grant Announcement:

School Threat Assessment Protocol – U.W. Validation Study 2021

July 1, 2021 – December 31, 2023

Applications must be submitted through Egrants

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Contact Information

- For any general program, policy, or budget questions related to School Safety Grants:
 - Please submit via email to: schoolsafetygrants@doj.state.wi.us
- For any questions related to the Egrants process:
 - An Egrants system user guide, tailored to the School Safety Initiative and containing step-by-step instructions for accessing and using the Egrants online system, through grant award instructions, is available here: <https://www.doj.state.wi.us/sites/default/files/school-safety/grant-instructions.pdf>
 - Online help is available throughout the Egrants application. Once you have started an application, look for the HELP button in the top right corner of the screen, and you will be directed to page-specific instructions.
- Department of Justice (DOJ) Egrants technicians are available for technical issues (only) on non-holiday weekdays from 8am to 4:30pm CST.
 - Email: Egrants@doj.state.wi.us
 - Madison area local calls: (608) 267-9068
 - Statewide toll free: (888) 894-6607
- The [DOJ Grants Administrative Guide](#) provides assistance with grants management and fiscal management rules, such as allowable costs and procurement.
- DOJ Office of School Safety: <https://www.doj.state.wi.us/oss>

Grant Announcement Summary

Program Area: School Safety

Grant Title: School Safety Initiative – School Threat Assessment Protocol – U.W. Validation Study 2021

Description: The Department of Justice (DOJ) is seeking applications from schools chosen to participate in the U.W. Madison’s Validation Study of the Wisconsin School Threat Assessment Protocol. Proposed expenditures should enhance or improve upon existing efforts to prevent school violence through access to internal and external behavioral health resources.

The goal of this program is to provide schools with financial assistance to support students who present as a medium or high risk of violence.

Anticipated Funding Amount:

A total of \$3,000,000 is available in this funding. Up to 40 schools will receive up to \$75,000/school building. Districts are allowed to apply on behalf of multiple buildings.

Match/Cost Sharing Requirement:

There is no match required under this program.

Eligibility: Eligible applicants are limited to K-12 schools who have received an acceptance letter from UW Madison for the threat assessment validation study.

Eligible Expenses: Funding may be used for expenses related to providing direct access to school based mental health services or external mental health providers for students. These expenses may include contractual expenses for external mental health providers, cost of transportation of students to mental health services, equipment and infrastructure to support in-school tele/virtual mental health appointments, and the hiring of school-employed mental health providers.

All expenses must be new and cannot replace existing or budgeted state or local government funding. Substitution of existing funds with grants (supplanting) will be the subject of monitoring and audit. Violations may result in a range of penalties, including suspension of current and future funds under this program, suspension or debarment from DOJ grants, repayment of monies provided under a grant, and civil and/or criminal penalties.

Determining Eligibility

To be eligible schools must meet all the following criteria:

1. Possess and provide official documentation from the University of Wisconsin – Madison’s Education Department showing the school has been selected to participate in the DOJ/UW-Madison Threat Assessment Validation Study.

Questions about the eligibility criteria should be directed to School Safety Grants at schoolsafetygrants@doj.state.wi.us.

Eligible Expenditures

Eligible expenditures are those expenses reasonably and directly related to student assistance and/or intervention following a threat assessment of concerning or prohibited behavior. Examples of eligible expenses include:

1. Personnel not employed by the school who provide behavioral health resources to a person of concern believed to present a risk of violence. Such resource personnel may include psychologists, counselors, or other similar intervention personnel.
2. Personnel not employed by the school who provide psychological recovery services to the victims of actions or behaviors of the person of concern listed in #1, above. Such recovery personnel may include psychologists, counselors, social workers and/or similar community service providers.
3. School personnel whose primary duty is providing therapeutic intervention services to high-risk students. ***Note that this position must be new and cannot have been previously budgeted—see the prohibition against supplanting, page 7.*** Examples of eligible expenses would be the hiring of a new school counselor, social worker, psychologist, psychiatrist, or other mental health provider to provide therapeutic services.
4. Travel costs directly related to providing the therapeutic or recovery services listed above.
5. Supplies directly related to providing in-school tele/virtual mental health appointments.
6. Infrastructure directly required to create tele/virtual mental health systems.

Applicants with questions whether a proposed expenditure is eligible should contact School Safety Grants at schoolsafetygrants@doj.state.wi.us.

Ineligible Expenditures

Expenditures not listed as eligible are ineligible for funding. If an applicant believes that a proposed expenditure is equivalent to a listed expenditure, contact the Office of School Safety. None of the following expenditures are deemed equivalent, and therefore are ineligible for funding:

- Expenditures to continue existing projects or that supplant existing or budgeted funds
- School supplies, equipment, or infrastructure improvements not directly related to tele/virtual mental health appointments.
- Expenses incurred prior to the date of the award or after the end of the grant performance period.
- Costs in applying for this grant, such as consultants, grant writers, etc.
- Indirect costs or indirect administrative expenses.
- Out-of-state travel or airfare, unless approved by DOJ prior to the grant being awarded.
- Research and development.
- Memberships and dues.
- Service contracts or training beyond the performance period of the grant award.
- Personnel costs before or beyond the grant period; or contracts that deliver equivalent services before or beyond the grant period.

Supplanting

School Safety Grant funds must be used to supplement existing funds for program activities and must not replace (supplant) those funds that have been appropriated for the same purpose. Supplanting is prohibited.

- Definition: To deliberately reduce state or local funds because of the existence of school safety grant funds.
- Prohibition: School safety grant funds must be used to supplement existing funds for program activities and must not replace other funds that have been budgeted or appropriated for the same purpose.
- Supplanting: When local funds are appropriated for a stated purpose and state grant funds are awarded for that same purpose, supplanting occurs when the school reduces, reallocates, or replaces its local funds with school safety grant funds, thereby reducing the total amount available for the stated purpose. Example of prohibited behavior: a school employs a counselor and receives this grant. The school uses this grant to pay part of the salary of the counselor, supplanting local funds. Example of permitted behavior: a school has a counselor and uses this grant to hire an additional, new, and not-previously-budgeted counselor. Because the new counselor was not previously budgeted, the new position would not be supplanting existing funds.
- Monitoring: Supplanting will be the subject of application review, post-award monitoring, and audit.

Application Prerequisites

Applicants must meet all the eligibility criteria below to apply for this grant.

1. Have participated in and received funding from the DOJ's Office of School Safety – *School Safety Initiative* grant.
2. Agree to have every Threat Assessment Team member complete Basic Threat Assessment Team training.
*This requirement does not apply to schools designated by UW as “control” schools. This training will be available in July and August of 2021.
3. Agree to have every Threat Assessment Team member complete the two 4-hour DOJ-OSS Advanced Threat Assessment courses (Teen Dating Violence and Violent Extremism) no later than 10/12/21.
*This requirement does not apply to schools designated by UW as “control” schools. This training will be available in July and August.
4. Agree to administer a school climate and school safety survey to students and school staff at three time points, including Fall 2021, Spring 2022, and Spring 2023 as specified under “General Conditions.”
5. Agree to complete an electronic data submission each time a threat assessment protocol is completed at your school during the 2021-22 and 2022-23 academic years as specified under “General Conditions.”
6. Sign a Data Use Agreement with the University of Wisconsin-Madison.
7. Applicants must certify that all security practices and protocols previously required in the School Safety grant continue to be met, as specified under “General Conditions.”

General Conditions

Applicants must assist UW-Madison with data collection regarding the use and efficacy of threat assessments performed, following UW-Madison study requirements.

1. Administer a school climate and school safety survey to students and school staff at three time points, including Fall 2021, Spring 2022, and Spring 2023. At least 80% of students and staff at your building must complete the survey. Each survey will take no more than 30 minutes to complete and researchers will present all survey results back to schools. No school and district names will be associated with any data used for research purposes.
2. Complete an electronic data submission each time a threat assessment protocol is completed at your school during the 2021-22 and 2022-23 academic years. No identifying student information will be submitted, and no school or district names will be associated with any data used for research purposes.
3. Sign a Data Use Agreement with the University of Wisconsin-Madison.

Applicants must continue to meet general conditions from previous grant funding announcements. Applicants who have satisfied these conditions through previous School Safety Initiative grants are not required to re-complete these conditions—applicants need merely certify these conditions remain in place (in Section 7 of the grant application).

1. Operate a Threat Assessment Team (“TAT”) following the DOJ’s standardized guidelines. [*This requirement does not apply to UW-designated “Control” schools.*]
 - a. Threat Assessment Team (TAT) component
 - Perform ongoing violence-related threat assessments, behavior monitoring, and intervention. TAT tracks, monitors, assists, and intervenes with at-risk youth.
 - Utilize standardized DOJ TAT process, format, and organization
 - Utilize standardized DOJ Wisconsin School Threat Assessment Protocol.
 - b. TAT requirements:
 - All members must have completed the DOJ Basic Threat Assessment Team course
 - All members must complete two DOJ Advanced Threat Assessment courses (Teen Dating Violence and Violent Extremism).
 - The team must include at least one member of the local law enforcement agency with jurisdiction
 - The team must consist of, at a minimum, an administrator, a law enforcement officer, and a student services provider. The team should be supplemented on a case-by-case basis with staff that have knowledge or skills related to the student or topic of evaluation.
 - c. TAT must meet at regular intervals, in person, no less than once per quarter, but more regularly if determined necessary by the team.

2. The district must satisfy all reporting requirements for the 2021-2023 school years specified in 2017 Wisconsin Act 143 as specified in Wis. Stat. § [118.07\(4\)\(e\)](#).
3. The district must participate in and promote the DOJ confidential threat reporting line, *Speak Up, Speak Out Wisconsin* (“SUSO”, <https://speakup.widj.gov>). To do so, the school shall provide school contacts by October 12, 2021, and shall send at least one person to the SUSO orientation webinar by October 12, 2021. Schools may receive an additional \$500 for SUSO promotional materials.
4. The applicant must complete all required program and fiscal reports.
5. All entrances to the school are locked during the school day; *and*
6. A designated staff member is present to visually screen everyone entering the school through an unlocked point of access whenever an exterior entrance is unlocked prior to, during, or immediately after the regular school day.
 - “Visual screening” is defined as a staff member stationed at each unlocked entrance who actively monitors ingress and egress through the unlocked exterior door(s).
 - Note that schools do not need to station a staff member at unlocked entrances outside of “regular school day” hours. For example, Happy High School unlocks its front doors at 7:30am to allow students to enter in preparation for the 7:50am beginning of the school day. The day ends at 3:15pm, with most students having exited the building by 3:30pm. Therefore, a staff member would have to be physically present to visually screen ingress/egress from 7:30am to 7:50am and from 3:15pm to 3:30pm. If school doors remain unlocked after 3:30pm for after-school activities, a staff member is no longer required, as after-school activities are outside the “regular school day.” Applicants must certify this in the Project Narrative (section 7) of Egrants.
 - Cameras cannot be used to perform visual screening. Effective visual screening requires staff to be physically present. The staff member can clearly view everyone entering the school, change position or follow a person to further observe suspicious person(s) or behavior; challenge or stop an unknown or suspicious person; shut and lock the entrance to the school; give security directions to students, etc. The human element also provides the climate and culture we need in schools. A personal greeting of visitors, staff, and students sets the tone for putting people first. Remote monitoring cannot effectively accomplish all of these tasks.
 - Exerting control over who enters a school facility is a basic foundational concept of school security. Thus, all applicants are required to meet this criterion, with the exception of those who cannot comply as described in the next paragraph.
 - Please note: a school that shares its entrance or common area with a third

party, including a religious center, where doors cannot be locked throughout the school day, is exempt from the “locked entrance” and “visual screening” requirements.

7. Applicants must certify that each school has a written visitor protocol. Applicants must certify this in the Project Narrative (section 7) of Egrants.

Award Information

Project funding will be provided by DOJ. Upon application approval, the applicant agency’s project director will receive paper grant award documents by mail.

- Once grant award documents are signed and returned to DOJ, the project may begin on the date listed.
- DOJ grant programs are funded on a reimbursement basis, meaning that during the grant period, funded projects will track approved expenditures and request reimbursement from DOJ through quarterly fiscal reports. Applicants concerned about this reimbursement basis should consult the Office of School Safety before submitting an application.

Submit Applications Using Egrants – Previous Applicants

Applications must be submitted through the Egrants online grants management system:

<https://egrants.doj.state.wi.us/egmis/login.aspx>

- If you have never used Egrants before, you will need to register for access to the system.
 - To register online, go to <http://register.wisconsin.gov/AccountManagement/> and complete the “self-registration” process.
 - On the account registration site, you will have a choice between the DOJ Egrants and WEM EGrants.
 - *Please take care to select **DOJ** Egrants during this process.*
 - Authorization to access Egrants can take several days depending on registration activity. Authorizations are only processed during normal business hours.
 - Once your Egrants access has been approved, you may begin your online grant application.

An Egrants System User Guide, tailored to the School Safety Initiative, is posted here: <https://www.doj.state.wi.us/office-school-safety/grant-instructions.pdf>

- If you have any problems using Egrants, please contact the DOJ.

Application Components

- Through Egrants, you will provide DOJ with information about your program that will be used to make a funding decision.
- Questions on what is expected in each section can be directed to schoolsafetygrants@doj.state.wi.us
- The Grant Administrative guide refers to DUN and CCR/SAM numbers (page 8). Note that The School Safety Initiative is a *state* grant application, so those two numbers are not necessary. The Grant Administrative Guide is a DOJ publication that addresses both federal and state grant applications. DUN and CCR/SAM numbers are needed for *federal* grant applications.

1. Main Summary

This page asks for information about your organization and the three individuals responsible for the application and grant award. The *financial officer* is the individual responsible for financial activities in your organization. The *project director* will oversee project operations. The *signing official* for public school districts is the school board president or superintendent. For private schools the signing official is the head of the governing board.

Each responsible individual in this grant must be a different person.

In the Brief Project Description text box, please describe your program(s) in 150 words or less. An example is shown below for your convenience:

“Happy School District will use these grant funds to provide additional and/or specialized intervention services to students exhibiting concerning or prohibited behavior and believed to be at risk of committing violence.”

Responses to this section will be used on the DOJ website, cited in DOJ reports and could be mentioned in press releases. Plain language that clearly describes the intent of the project is most effective. There are many required fields on this page so if you encounter problems, please check online help by clicking the floating HELP button.

2. Approval Checklist

Please answer “Yes” or “No” to each question. It is anticipated that the response to most questions will be “No” or “N/A.” The Department of Justice is responsible for the administration of numerous federal grant programs, and many of these questions are intended to meet federal grant guidelines and requirements. In addressing these questions, specifically, please note the following guidance:

For Question #5: A school district would be considered a local government agency and should respond to this question accordingly. Please note that as this is not a federal grant program, therefore no documents need to be submitted to DOJ.

<p>5. Are you a state or local government agency; AND have 50 or more employees; AND applying for \$25,000 or more? No *</p> <p>If yes, you are required to prepare and implement an Equal Employment Opportunity Plan (EEOP) or Certification form (if applicable). A copy of your EEOP federal approval letter must be submitted to DOJ. (More information may be found at http://www.doj.state.wi.us/grants/grantee-civil-rights-information) (federal EEOP required response)</p>

For Question #6: Responses to this question are anticipated to be “No.” It is not anticipated that any applicant for the School Safety Initiative would meet the thresholds described (more than 80% of annual gross revenues received in federal funds AND more than \$25 million received in federal funds).

For Question #7: If Question #6 is answered ‘No,’ the response to Question #7 should be ‘N/A.’

<p>6. If this application is \$25,000 or more, did your business or organization (including parent organization, all branches, and all affiliates worldwide) receive in the previous fiscal year (1) 80% or more of your annual gross revenues in US federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?; AND (2) \$25,000,000 or more in annual gross revenues from US federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements? (required by The Federal Funding Accountability and Transparency Act) No *</p>
<p>7. If you answered yes to the previous question, does the public have access to information about the compensation of the senior executives in your business or organization (including parent organization, all branches, and all affiliates worldwide) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986? N/A *</p> <p>If you answered no to the first part of this question; you must attach to this application the full names and compensation of the top 5 highly compensated individuals of your organization as required by The Federal Funding Accountability and Transparency Act.</p>

3. Performance Measures

Please open this section and change the page status to Complete; then save the page. All research-based data will be collected through the UW survey process rather than through this funding application process.

4. Budget Detail

Complete a project budget using these five budget subcategories:

- Personnel
- Employee Benefits
- Travel/Training
- Supplies/Operating Expenses
- Consultants/Contractual

For each subcategory used, enter a justification that describes how the items in that subcategory will be used during the grant period.

Budget estimates should be conservative and specifically designed to meet project needs.

Budget Detail Subcategories

In the Budget detail Section, please provide summary budget details and computations for the overall project. The “description of computation” in each of these subcategories should be detailed enough to explain the purposes of each entry.

Personnel:

School personnel whose primary duty is providing therapeutic intervention services to high-risk students. Note that this position must be new and cannot have been previously budgeted—see the prohibition against supplanting, page 7. Examples of eligible expenses would be the hiring of a new school counselor, social worker, psychologist, psychiatrist, or other mental health provider to provide therapeutic services. Only school personnel costs should be included under “personnel”—personnel employed by outside providers are “contractual” personnel.

Provide salary information for employees that will be funded through this grant, including overtime. List each position by title. Show the annual salary rate and the percentage of time/number of hours to be devoted to the project. Compensation paid for employees engaged in grant activities must be consistent with that paid for similar work within the applicant organization. Example for computation line: $\$38.24/\text{hr.} \times 2080 \text{ hr.} = \$79,539$. When entering this into the amount text box please round up to the nearest dollar.

Employee Benefits:

Employee benefits for grant-funded personnel include FICA, Unemployment Compensation, Health Insurance, etc. and amounts budgeted should be based on actual known costs or an established formula. Employee benefits are for the personnel listed in the budget and only for the percentage of time/number of hours devoted to the project. Employee benefits on overtime hours are limited to FICA, Workers’ Compensation, and Unemployment Compensation. Example for computation line: $\$79,539 \text{ 1.0 FTE salary} \times 43\% \text{ fringe rate} = \$34,202$. When entering this into the amount text box please round up to the nearest dollar.

Travel/Training:

Any travel and/or training reimbursement costs related to providing threat assessments and direct access to mental health services for students. Only actual expenses will be reimbursed. All reimbursements will be at current state rates that are subject to change. Current rates for in-state travel at the time of this announcement include the mileage rate of \$0.51/mile. Out-of-state travel and/or airfare costs are ineligible for reimbursement without prior approval from the DOJ.

Travel/Training: Any travel and/or training costs associated with the funded project. Only actual expenses will be reimbursed. All reimbursements will be at current state rates that are subject to change. Expenses incurred in the employee's headquarter/city are ineligible.

Current rates for in-state travel at the time of this announcement include:

- Mileage: \$0.51/mile

Please note: Travel and training for contracted employees does not go in this section. These expenses should be itemized under "Contractual."

Supplies/Operating Expenses:

Supplies directly related to providing in-school tele/virtual mental health appointments.

Consultants/Contractual:

Provide costs associated with individuals or entities providing services through a contractual arrangement, such as counseling services or construction of space to provide in-school tele/virtual mental health appointments. With the exception of a few justified sole source situations, contracts should be awarded via competitive processes. Attach detailed information to support the total cost of each contract. For each consultant/contractor enter the name, if known; service to be provided; hourly or daily fee (8-hour day); and estimated time on the project. Fees in excess of \$650 per 8-hour day for any independent consultant require additional justification (contact DOJ). When creating the Consultants/Contractual budget, list all expenses to be paid from the grant to the individual consultant in addition to their fees (including travel). Show the basis of computation for each service requested. No fund reimbursements will be made prior to receipt of the contract.

5. Budget Narrative

1,500-word limit. Please describe how your budget relates to the overall project strategy or implementation plan. The narrative should describe the proposed activities and budget for your project.

6. Compliance Plan

Applicants must certify their compliance with the requirements of 2017 Wisconsin Act 143. (Instruction and assistance regarding compliance with Act 143 is available here: <https://www.doj.state.wi.us/office-school-safety/act-143>.)

- a copy of the blueprints/maps of each pupil occupied building
- a copy of its School Safety Plan, including the most recent date on which the school board or governing body reviewed and approved the school safety plan;
- the date(s) of the required annual School Violence Drill(s) during the previous year, including certification that the school board or governing body reviewed a required written evaluation of the school violence drill(s);
- the date of the most recent school safety training, and the number of attendees.
- the most recent date on which the school board or governing body consulted with a local law enforcement agency to conduct required on-site safety assessments.

7. Eligibility Requirements

- All applicants must certify:
 - Current and future compliance with UW-Madison Validation Study requirements.
 - Participation in and promotion of the OSS confidential threat reporting line Speak Up, Speak Out Wisconsin as described in the “General Conditions” of this grant announcement and award documents.
 - Compliance with all prior grant requirements:
 - All entrances to the school are locked during the school day, and a designated staff member is present to visually screen everyone entering the school through unlocked points of access whenever an exterior entrance is unlocked prior to, during, or immediately after the regular school day.
 - Each school has a written visitor protocol.

- Variable schools must also certify:
 - The school has a Threat Assessment Team following the DOJ model.

8. Letters of Support

- Applicants must provide a copy of each building’s Acceptance Letter from the University of Wisconsin – Madison/Wisconsin Department of Justice – Office of School Safety, confirming their acceptance into the Threat Assessment Validation Study. Please upload your acceptance letter/s in this section.

Application Review and Evaluation Criteria

Applications will only be considered if all the required elements are completed.

All applications will be screened for completeness and compliance with the instructions provided in this announcement.

DOJ reserves the right to adjust, lower, and/or change the application budget and the requested amount of funding at DOJ's sole discretion.

Grant reviewers may suggest amendments to applications. Grant applicants will be contacted if more information is needed to clarify elements of their proposal.

Review/Appeal Process for Grant Funding Decisions

An applicant may appeal DOJ's decision of *School Threat Assessment Protocol – U.W. Validation Study 2021* funding. The applicant must request a review of the decision in writing. To be timely, a request must be received by OSS no later than 10 business days after the date on the denial/intent to award letter.

The written request should be sent to:

Office of School Safety
Attn: Kristen Devitt
17 West Main Street, 8th Floor
P.O. Box 7857
Madison, WI 53707-7857

or emailed to Kristen Devitt at devittka@doj.state.wi.us.

An appeal must be signed by an authorized official in your school/district and include facts or developments that were not known to you at the time of your original application, which in your view should significantly impact the consideration of your application.

Requests to appeal will not be granted if the information received:

- Merely reiterates or restates information or contentions submitted as part of an application;
- Seeks to revise or amend the original application;
- Makes comparisons with other applicants or applications;
- Disputes policy judgments or discretionary decisions made by the review team in formulating its recommendations.

The Office of School Safety will notify the applicant that the appeal has been received and will respond to the applicant within 30 days of the receipt of all information needed to make the decision. OSS reserves the right to review and reconsider all elements of the grant application during an appeal. The Attorney General's Office and the Office of School Safety will review and make final decisions on all appeals.

If the denial decision is rescinded, OSS will discuss the specific scope, activities, goals and budgetary terms of individual projects to be offered grant funding. Such discussions will likely require revision and resubmission of pertinent administrative, programmatic and financial information.

Post-Award Special Conditions/Reporting Requirements

If you are awarded funds under this announcement, you will be required to provide regular progress reports. The schedule for your reports will be included in your grant award materials. At that time, please review all of your grant award special conditions and Egrants reporting requirements. In addition to any special conditions described in your award documents and reporting requirements contained in Egrants, you will need to provide the following:

1. Grant recipients are advised that DOJ will monitor grants to ensure that funds are expended for appropriate purposes and that recipients are complying with state and federal requirements as described in the grant award contract. This includes timely completion of progress and financial reports, active efforts to achieve and measure stated goals and objectives, appropriate documentation of activities and outcomes, and adherence to any conditions included in the grant award.
2. DOJ reserves the right to withhold grant payments if the grant recipient is delinquent paying any obligation to DOJ such as background check fees, etc.
3. All awards are subject to the availability of appropriated funds and to any modifications or additional requirements that may be imposed by law.
4. Please be advised that a hold may be placed on any application or grant payment if it is deemed that an agency is not in good standing on other DOJ grants, has other grants compliance issues that would make the applicant agency ineligible to receive DOJ funding, and/or is not cooperating with an ongoing DOJ grant review or audit.
5. A hold may also be placed on any application or grant payment if it is deemed that an agency is not in compliance with federal civil rights laws and/or is not cooperating with an ongoing federal civil rights investigation.
6. Violation of any term of this grant award may result in the department exercising its authority under Wis. Stat. [§165.25\(2\)](#).