WISCONSIN DEPARTMENT OF JUSTICE

GRANTS ADMINISTRATIVE GUIDE



Wisconsin Department of Justice 17 W. Main Street P.O Box 7857 Madison, WI 53707-7857

Goal of Guide

DOJ has prepared this guide in an attempt to provide recipients with basic information that will facilitate the efficient administration of our grant programs. Circulars published by the Office of Management & Budget (OMB), the Office of Justice Programs' (OJP) Financial Guide, ODP Financial Guide, DOJ policy memoranda, and other federal and state regulations were used in preparing this guide. Please note that this Guide is not meant to be all-inclusive. More details on rules and regulations for federal grant programs can be found in this guide.

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A. Before You Apply

I. Overview of DOJ grants

i. The Life of the Grant (Stages of the Process)



ii. Eligibility for Funding

DOJ administers block, formula, and discretionary grants to units of state and local government, tribes and tribal organizations, educational institutions, hospitals, and private non-profit organizations. Eligibility for funding varies by grant program and initiative. Please review all funding announcements for your agency's eligibility. (see the DOJ website at https://www.doj.state.wi.us/)

iii. Application Period

Once a funding announcement is generated by DOJ, eligible applicants will have a set time period to complete all required sections and submit the application in Egrants. Incomplete applications cannot be submitted and will be omitted from funding consideration.

iv. Review Process

Once an application period has ended, the grant review process begins. It is during this period that DOJ will address any questions that may arise from completed applications. An internal or external grant review will then follow. Applicants selected for funding will receive grant award contract documents. Those not selected will be notified.

v. The Grant Announcement

The first step of the grants process is to download the grant announcement and review it carefully to learn the specific requirements of the grant for which you want to apply. While DOJ uses a standard grant announcement template across all program areas, basic eligibility requirements, application forms, information, and procedures vary for each solicitation. Many have strict guidelines and fixed deadlines.

Deadlines are clearly stated on the front cover of the grant announcement. Highlight the deadline, and note that while Egrants is programmed to close at 11:59 pm CST on the date listed, program staff and the Egrants Help Desk will be unavailable to assist after the close of business hours. In most situations, applications that are not completed and submitted by the deadlines will not be considered for funding.

vi. The Application

A grant application is a formal, written request for funds to support a specific program or project. Although the exact content of a grant application is determined by specific program guidelines, most grant applications explain (1) why the funds are needed, (2) what the funds will be used for, and (3) how the funds will be managed.

All DOJ programs require you to submit your application online, in DOJ's Egrants system. Although specific application requirements vary by program, DOJ has standard sections that must be completed across programs. Please see the application section of this guide for more details on this process.

vii. The Grant Award

Upon acceptance of your application, you will be sent a grant award packet signed by the Attorney General. Your award documents contain:

- Your grant number
- Your approved project period and budget
- Your financial and programmatic reporting schedule
- All general grant conditions
- Any special conditions placed on the grant

You will receive two copies of signed award documents. Both copies must be signed by both the Project Director and Signing Official. One copy should be retained for your records, while the other must be mailed back to DOJ within 30 days of receipt. Please note that your grant is not officially active until DOJ receives your signed award documents.

viii. The Project Period

Once you sign and return your grant award to DOJ, your project may begin on the date listed, and you can begin spending your grant funds. DOJ grant programs are all funded on a reimbursement basis, so during the grant period you will track your expenditures and submit scheduled <u>G-2 Financial Reports</u> to request reimbursement.

During the grant period you will also be expected to submit scheduled programmatic reports, which will detail your progress towards the goals of your grant.

During your project period, you can also request modifications to your grant. Modifications must be submitted for the following changes:

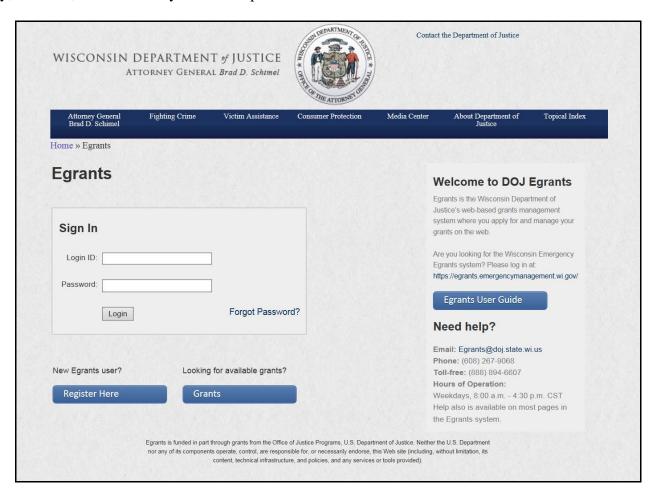
- Changes in approved budget
- Changing project staff
- Requesting an extension to the project period
- Changing performance measures

All changes to your approved grant award require prior approval.

II. Register for Egrants

All applications for DOJ funding opportunities are submitted through Egrants (https://egrants.doj.state.wi.us/egmis/login.aspx), our electronic grants management system. Egrants **requires** registration, and it can take anywhere from a few days to 2 weeks for your registration to become active and for you to be able to submit an application.

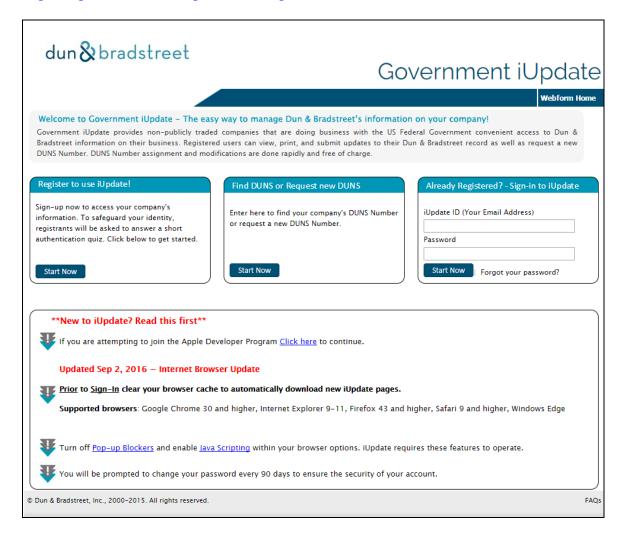
It is not necessary to re-register if you already have user IDs and passwords for the Egrants system. Check early, however, to ensure that your ID and password are active.



III. Get a DUNS Number

The federal government now requires a DUNS (Data Universal Numbering System, from Dun & Bradstreet) number as part of the grant application to keep track of how federal grant money is awarded and disbursed. If your organization needs to obtain a DUNS number, go to http://fedgov.dnb.com/webform. You can also search this site if you cannot find your agency's number. Under normal circumstances, a new account can be created in 24-72 hours. The federal government has published DUNS Frequently Asked Questions at http://fedgov.dnb.com/webform/displayFAQPage.do. Check with your agency's financial office before registering for a DUNS number - it is likely your agency already has one.

You can look up your DUNS number at the following link: https://iupdate.dnb.com/iUpdate/viewiUpdateHome.htm



DOJ cannot award grant funds until an active DUNS number is provided.

Tips

Please consider the following tips during the application process:

- Give yourself sufficient time to get registered in Egrants, and confirm your DUNS Number.
- Familiarize yourself with the grant announcement requirements and make sure that you are eligible well before the application submission deadline.
- Consider your budget early, and familiarize yourself with the guidelines.
- After determining eligibility and the allowability of your budget, review all reporting requirements to make sure your agency can meet all grant requirements if your project is funded.
- Utilize the Egrants User Guide and learn how to navigate in the system.
- Start to enter your application in Egrants well before the submission deadline, and contact the Egrants Help Desk with any issues that need to be resolved.

B. Writing the Application

I. Writing the Application Overview

A grant application is a formal, written request for funds to support a specific program or project. Although the exact content of a grant application is determined by specific program guidelines, most grant applications explain (1) why the funds are needed, (2) what the funds will be used for, and (3) what the expected outcomes will be.

All DOJ programs require you to submit your application online, in DOJ's Egrants system. Although specific application requirements vary by program, DOJ has standard sections that must be completed across programs. This section reviews the basic requirements of your application, including tips on how to:

- Develop ideas for your project's application.
- Collaborate with your community.
- Develop a budget.
- Identify your project's strategic plan.
- Select someone to write the application.
- Write and submit the application.

i. Writing Tips

The application process is usually highly competitive, with numerous grant applications competing for the same funds. To increase your chance of receiving funding, your application must meet at least two goals: (1) inform the reader of your plans, and (2) persuade the reader that your project is worthy of funding.

Sell the reviewers on the following points—

- The need or problem that you will address or fix with the grant money is significant and worthy of funding.
- The project or program is well planned, both from DOJ's and your point of view, to ensure a successful implementation if the funds are awarded.
- You are capable of successfully managing the funds and completing the proposed project on schedule and meeting your goals and objectives.

Respond to reviewers' needs and expectations by—

- Including details that sufficiently clarify your plans for the reviewers, who may be unfamiliar with them and who may be reading several other grant applications at the same time.
- Providing good reasons for funding the proposed project in view of the grant announcement's purpose and goals.
- Ensuring that the application is well written and that important information is easily accessible. Reviewers who have trouble accessing or understanding important information will not be convinced that the proposed project deserves funding.

ii. Developing a Plan for your Application

The first step in good grant writing is to have a plan. Know what projects will advance your community's goals, then find a funding opportunity that fits your plan. Don't try to make your plan fit into a funding opportunity if it does not (in other words, don't 'chase the money'). Your project must fit into DOJ's philosophy and mission, and the need you are addressing must be well documented and clearly articulated. Typically, DOJ will want to know that a proposed activity or project reinforces its overall mission and that the project is important to meeting the needs of the community.

To make a compelling case, include the following in your application—

- The nature of the project and its goals, needs, and anticipated outcomes.
- How the project will be conducted.
- A list of proposed deliverables.
- A timetable for completion.
- How best to evaluate the results (performance measures).
- Staffing needs, including the use of existing staff and new hires or volunteers.
- A budget, covering expenses and financial requirements, to determine what funding levels to seek.

iii. Collaboration

Community support for many applications is essential

Look for individuals or groups representing academic, political, professional, and faith- and community-based organizations that may be willing to support the application. Letters of support can influence the grant review panel. DOJ and its peer reviewers consider the type and caliber of community support as critical when they review applications. However, be sure to follow the guidelines of the grant announcement, which may limit the number of letters of support or may discourage them entirely.

Elicit support from local government agencies and public officials

Letters of support from local government and public officials detailing the areas of the project they are supporting and any financial or in-kind commitment are often requested as part of an application. Keep in mind that it may take several months to develop these relationships and acquire letters of support if something of value (e.g., buildings, staff, services) is negotiated between the parties.

Give thought to the kinds of nonmonetary contributions that may be available to you

In many instances, academic institutions, corporations, and other nonprofit groups in the community are willing to contribute technical and professional assistance, equipment, or space. Such contributions will reduce the amount of money you request for your project, and most reviewers will view evidence of such local support favorably.

Many programs require agreements in writing before they will approve a grant or award funds

These could include memoranda of understanding or shared service agreements.

II. The Budget

Start thinking about your budget requirements early

Funding levels of grant programs change each year. If you are developing a budget in anticipation of a solicitation being announced and do not yet know the funding amount, review the same grant solicitation (if offered in past years) to project future funding levels. You also can use past solicitations to make lists of budget items needed for the project.

Although the degree of specificity of any budget will vary depending on the nature of the project and DOJ program requirements, a complete, well-thought-out budget serves to reinforce your credibility and increase the likelihood of your application being funded.

Keep in mind the following—

- A well-prepared budget should be reasonable and demonstrate that the funds being asked for will be used wisely.
- The budget should be as specific as possible in its estimates. Make every effort to be realistic and to estimate costs accurately.

Your budget should justify all expenses and be consistent with the program narrative:

- Salaries should be comparable to those within the applicant organization.
- If new staff is being hired, additional space and equipment are considered, as necessary.
- If the budget lists an equipment purchase, it is the type allowed by the agency.
- If additional space is rented, the increase in insurance is supported.
- Only include Indirect Costs or administrative costs if allowed by the grant announcement.

While budget adjustments are sometimes made after the grant award, this can be a lengthy process. It's best to be certain that program implementation costs can be met with the budget you submit with the application. Only ask for the amount you need for your program, regardless of the maximum amount allowed in the grant announcement.

Your budget must include all of the information asked for in the grant announcement, including:

- Personnel—List each position by title and employee name, if available. Show the annual salary rate and the percentage of time to be devoted to the project. Compensation paid for employees engaged in grant activities must be consistent with that paid for similar work within your organization. List only the employees of the applicant organization; all other grant-funded positions should be listed under the consultants/contracts category.
- **Fringe Benefits**—Base fringe benefits on actual known costs or an established formula. Fringe benefits are for listed personnel and only for the percentage of time devoted to the project. Fringe benefits on overtime hours are limited to FICA, workers' compensation, and unemployment compensation.
- **Travel**—Itemize travel expenses for project personnel by purpose (e.g., staff to training, field interviews, advisory group meetings). Show how you calculated these costs (e.g., six people to 3-day

training at \$X airfare, \$X lodging, \$X meals). In training projects, list travel and meals for trainees separately. Show the number of trainees and the unit costs involved. Identify the location of travel, if known. Stay within the allowable state rates for lodging, mileage, and meals.

- **Equipment**—List nonexpendable items that are to be purchased. Nonexpendable equipment is tangible property having a useful life of more than 2 years and an acquisition cost of \$5,000 or more per unit. Include expendable items either in the "supplies" category or in the "other" category. Analyze the cost benefits of purchasing versus leasing equipment, particularly high-cost items and those subject to rapid technical advances. List rented or leased equipment costs in the "contractual" category. Explain why the equipment is needed for the project to succeed. Attach a narrative describing the method that will be used to procure the equipment.
- Supplies—List items by type (office supplies, postage, training materials, copying paper, and expendable equipment items costing less than \$5,000, such as books and handheld tape recorders) and show how you calculated these costs. Generally, supplies include any materials that are expendable or consumed during the course of the project.
- Consultants/Contracts—Indicate whether you will follow your organization's formal, written procurement policy or the Federal Acquisition Regulations.

Consultant Fees: For each consultant, enter the name, if known, service to be provided, hourly or daily fee (8-hour day), and estimated time on the project. Consultant fees in excess of \$650 per day require additional justification and prior approval from DOJ.

Consultant Expenses: List all expenses to be paid from the grant to the individual consultants in addition to their fees (e.g., travel, meals, lodging).

Contracts: Describe the product or service to be procured by contract and provide an estimate of the cost. Promote free and open competition in awarding contracts. You must provide a separate justification for sole-source contracts of \$100,000 or more.

- Other Costs—List items (e.g., rent, reproduction, telephone, janitorial or security services, investigative or confidential funds) by major type and show how you calculated the costs. For example, for rent, provide the square footage and the cost per square foot or a monthly rental cost and how many months of rent are proposed.
- Indirect Costs—Indirect costs are allowed only if you have a federally approved indirect cost rate and you attach a copy of the rate approval (a fully executed, negotiated agreement). Only include Indirect Costs or administrative costs if allowed by the grant announcement.

Remember to include computations that clearly show how the costs were derived for each line item.

Supplanting

Federal 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 federal funds.
- **Prohibition:** Federal funds must be used to **supplement** existing funds for program activities and must not replace those funds that have been appropriated for the same purpose.
- **Example:** When state funds are appropriated for a stated purpose and federal funds are awarded for that same purpose, the state replaces its state funds with federal funds, thereby reducing the total amount available for the stated purpose.
- Monitoring: Supplanting will be the subject of application review, postaward monitoring, and audit.

Example of Supplanting

For FY 2016, County Y budgeted \$1 million in local funds to be used for law enforcement activities. Later in FY 2016, County Y is awarded Federal JAG funds and it determines that it will use the JAG funds instead of the \$1 million allocated from local funds to support the same law enforcement activities, and will use the funds the county had budgeted for law enforcement activities instead to support their OWI and Drug Court Program. No additional local funds were added to the local budget in any other law enforcement category.

Under these circumstances, supplanting **would have** occurred, as there would have been a decrease in "the amounts of ... funds that would, in the absence of Federal funds, be made available for law enforcement activities."

If the county would have used the Federal JAG funds for law enforcement activities to supplement the budgeted \$1 million in local funds and to increase capacity for these activities, it would not be considered supplanting.

Sustaining the Project

Many grant programs require applicants to include information that explains how they will fund and sustain the project once the grant funds have been expended. Describe a plan for continuing your project beyond the grant period, and outline all other fundraising efforts you are considering and any plans to apply for additional grants in the future. Please note that it is prohibited to use grant funds or grant-funded positions for your fundraising efforts. Also, provide projections for operating and maintaining facilities and equipment. Discuss maintenance and future program funding if program funds are for construction activity. Account for other needed expenditures if the program includes purchasing equipment.

III. Match Requirements

Match is to be provided for on a project-by-project basis, unless otherwise stated in the program guidelines. For types of justice programs grants match is restricted to the same use of funds as allowed for federal funds.

I. Types of Match

Hard Match (Cash)

- Includes cash spent for project related costs
- Any time devoted to the project by an employee of the recipient that is not reimbursed by DOJ is considered cash match.

Soft Match (In-Kind)

- Includes, but is not limited to, the valuation of in-kind services
- In-kind is the value of something received or provided that does not have a cost associated with
 it
- For example, if in-kind match is permitted by law, then the value of donated services could be used to comply with the match requirement.

II. How To Calculate Match

To calculate the total budget and match amounts for a 25% match requirement, use these formulas:

- Award Amount ÷ 0.75 State/Fed Share = Total Project Budget
- Total Project Budget x 0.25 Recipient's Share = Required Match

Example: For a grant award of \$125,000, the calculation would be:

- Total Project Budget: $$125,000 \div 0.75 = $166,667$
- Required Match: \$166,667 x 0.25 = \$41,667

III. Source and Type of Funds

Note on Match:

For Justice Programs Grants, the following definitions apply:

Cash match (hard)

• Includes local funds (cash) spent by the jurisdiction for project-related costs. An allowable cash match must include costs which are allowable with DOJ funds, except acquisition of land, when applicable.

Third party in-kind match (soft)

- includes, but is not limited to, the valuation of non-cash contributions.
- "In-kind" may be in the form of services, supplies, real property, and equipment.

For example, if in-kind match is permitted by law, then you can use the value of donated services to comply with the match requirement. Also, third party in-kind contributions may count toward satisfying match requirements, provided the recipient of the contributions expends them as allowable costs.

Based on the TAD statute and the definitions above, the local match provided needs to be cash match. It is important to note, however, that salaries and fringe can be included as cash match, as long as they are local funds (not federal or state funds) being used toward the project that are also not being used as match toward another grant. For example, if you are funding 50 percent of a project coordinator with TAD and 50 percent with local funds, the 50 percent funded by your jurisdiction could be used as match. You could also use items such as rent, equipment, etc. that the county has funded toward the program (these items would also be considered cash match).

It is important to note that state or federally-funded positions (i.e. judges, prosecutors) cannot be used as local match.

Documentation supporting local match must be maintained in the award recipient files.

Hard match (cash) may be applied from the following sources:

- Funds from state and local units of government that have a binding commitment of matching funds for programs or projects
- Funds from the Housing and Community Development Act of 1974, 42 U.S.C. 5301, et seq. (subject to the applicable policies and restrictions of the Department of Housing and Development)
- Equitable Sharing Program, 21 U.S.C. 881(e) (current guidelines developed by the DOJ Asset Forfeiture
 Office apply). Forfeited assets used as match from the Equitable Sharing Program would be adjudicated
 by a Federal Court
- Funds contributed from private sources
- Program income and the related interest earned on that program income generated from projects may be used as match provided it is identified and approved prior to making an award
- Program income funds earned from seized assets and forfeitures (adjudicated by a State court, as State law permits)
- Funds appropriated by Congress for the activities of any agency of a Tribal government or the Bureau of Indian Affairs performing law enforcement functions on Tribal lands
- Otherwise authorized by law

IV. Timing of Matching Contributions

Matching contributions need not be applied at the exact time or in proportion to the obligation of state and federal funds. However, the full matching share must be obligated by the end of the period for which the state and federal funds have been made available for obligation under an approved program or project. Time-phased matching may be required by DOJ on awards to nongovernmental recipients.

V. Records for Match

Recipients must maintain records which clearly show the source, the amount, and the timing of all matching contributions. In addition, if a program or project has included within its approved budget contributions which exceed the required matching portion, the recipient must maintain records of them in the same manner as it does the awarding agency funds and required matching shares.

IV. Strategic Plan

i. Identify Your Project's Strategic Plan

Being awarded a grant takes more than an idea and a funding source. It takes an organization that is well managed, that understands its purpose, and that uses its staff and board efficiently. A successful grant program requires the organization to identify its long- and short-term goals, the priorities of the proposed project, and the strengths and limitations of its staff and their procedures. This section will help you understand the importance of a strategic plan and provide a model for you to follow as you create your own strategic plan.

Why Engage in Strategic Planning?

- Stimulate team or organizational thinking.
- Add an element of science (such as research) to your thinking.
- Clarify your future direction.
- Generate support, buy-in, and teamwork.
- Improve the probabilities of success.

ii. What Is Strategic Planning?

Strategic planning helps you develop a direction for the future and details how to get there—how to solve a problem, how to implement a program or project, etc. Strategic planning can be broken down into two components: strategy and tactics. Strategy determines the overall direction of a plan and establishes its principle goals or mission; tactics concern the detailed plans, choices, and decisions made to reach the primary goal. In summary, a strategy helps people choose and implement tactics.

To achieve lasting improvements, you must consider not only immediate concerns or crises, but also issues that can appear tangential, such as community values, leadership styles, and the degree to which implementation disrupts routine. Above all, avoid implementing plans that achieve your goals but inflict significant hardships on organizations and communities. A plan that might work well for a large government contractor, for example, may very well run into problems if implemented by a small American Indian tribe—or vice versa.

iii. Elements of Strategic Planning

Developing a comprehensive strategic plan involves (1) thinking through and detailing plan elements, (2) developing the logic underlying the choice of elements, and (3) clearly documenting the plan. The logic model helps ensure that the plan will work, and that the elements (goals, objectives, tasks, and action steps) will lead to the desired results. The documentation helps preserve the connections. This information is critical for the evaluation phase. If the work is not done upfront when the project is being planned, the evaluator will have to reconstruct the logic and data needed for evaluation. At this stage, sometimes the necessary data has not been collected and is not available.

A strategy specifies how a vision will be achieved. A strategic plan begins with an assessment—both external to the organization and within it. This is similar to identifying and analyzing problems. The resulting strategic plan is made up of these elements:

- Vision
- Mission
- Goals and objectives: major steps to accomplishing a goal; specific, measurable, and achievable in a defined period of time
- Tasks: more specific activities designed to accomplish objectives
- Action steps: timeline, activities, persons responsible, sequential chain of events
- Results measurement

Goal-based strategic planning is the preferred process in community-based planning. Here is a guide to getting that done:

- Identify strengths, weaknesses, opportunities, and threats. These can exist both within and outside of your organization.
- Identify and prioritize major problems and goals. Go through the list of strengths, weaknesses, opportunities, and threats and identify your goals and the problems that might prevent your program from reaching those goals.
- Design major strategies (or programs) to address problems and goals.
- Design or update your mission statement (some organizations may do this step first).
- Establish action plans (e.g., objectives, resource needs, roles, responsibilities for implementation).
- Compile your strategic plan. A strategic plan contains all the documentation assembled so far and records problems, goals, strategies, an updated mission statement, action plans, and any identified strengths, weaknesses, opportunities, and threats.

The National Institute of Corrections offers a Starter Kit with information regarding:

- Developing a System Map
- Building Logic Models

iv. Select Someone to Write the Application

Waiting until the last minute to prepare an application is not a sound practice. Equally important is the need to select the person(s) who will write the application.

Some agencies and jurisdictions are fortunate enough to have a grant writer on staff who is responsible for preparing grant applications.

If you don't have a grant writer on staff, however, you have several options:

- Designate an agency employee.
- Write it yourself.
- Obtain the services of a professional grant writer.

Should you choose to **designate an agency employee**, do not do so without having a full understanding of that person's analytical and writing skills.

The person selected must be able to—

- Follow the instructions in the solicitation.
- Identify what must be included in the program abstract and program narrative by reading the solicitation.
- Assist staff or the agency head in determining measurable goals and objectives.
- Communicate in a clear and concise writing style.
- Establish accurate dollar amounts for the various budget items and totals for the cost categories.

Provide the designated employee with as much information as possible about the solicitation, and do not expect that person to read your mind. Ask the employee to read the solicitation and then take sufficient time to discuss the project you have in mind. Be sure that the person is familiar with the agency's goals and objectives or strategic plan, and brief the person on how you see the project fitting into your agency's master plan.

If you write the grant **yourself**, give yourself a dedicated block of time to focus on the necessary parts of the application. And make sure *you* are able to complete the tasks listed above for the designated employee.

You also can **hire a professional grant writer.** Fees may range from a flat fee to a percentage of the total amount of federal funds requested. Some grant writers work on a contingency basis, with the fee billed only if a grant award is made, while others require at least a partial payment for the time and effort put into preparing the application. **Fees charged by grant writers cannot be included as an expense in your grant budget.**

Ask the grant writer to provide a list of agencies that have used his or her services and were awarded a grant as a result. Make sure that the person's grant writing skills and areas of expertise are similar to the focus area of the grant solicitation. Be mindful that some people are self-proclaimed grant writing experts. Although they may have prepared many applications, their success rate may be minimal. **Do your research.**

v. Submit your Application

Once you have written the grant application, you must complete the application package and submit it online. Remember, all DOJ grant applications are submitted through our <u>Egrants system</u>. Applications must be submitted by the deadline listed on the grant announcement. **Late applications will not be accepted**.

Before You Try To Submit, Did You—

- Get a DUNS Number?
- Register With CCR?
- Register with Egrants?

If not, **do so as soon as possible.** You cannot submit applications to DOJ without first completing these steps, which can add several weeks to your schedule.

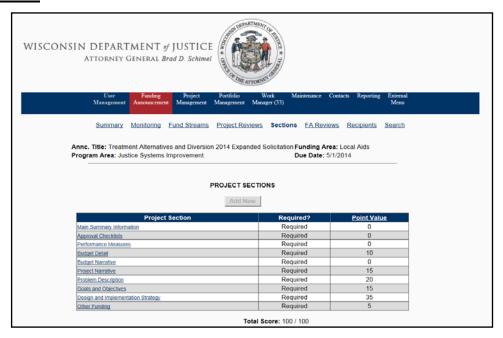
vi. Complete the Application Package

To complete your application in Egrants, you must fill out each section of your application and then mark them 'Complete.' Egrants will not allow you to submit your application until all sections are complete. Please refer to the Egrants User Guide (link) for detailed instructions on how to fill out an application in Egrants.

vii. Check Everything, and Then Submit

Check and recheck everything in your application package to ensure that it complies with the requirements of the grant announcement. <u>BE SURE TO HIT THE SUBMIT BUTTON or your application will not be</u> submitted, even if all sections are completed.

If you want verification that your application was received, contact the program manager listed in the grant announcement.



C. Post-Award

I. Grant Monitoring

The term 'monitoring' is used to describe both the broad overall system of reviewing and tracking the use of federal and state funds, and the more specific day-to-day review processes to assure that a particular subgrantee is in compliance with federal or state rules and regulations, and is meeting the goals and objectives of the grant. These day-to-day review processes include the following:

- Desk Reviews: Reviews of financial and narrative reports, audit reports, correspondence, and other documentation provided by the grantee agency
- **Telephone Contacts**: Direct communication with the grant recipient by telephone to ask or answer questions and check on the progress of the project
- On-Site Monitoring: A visit to the project site to review one or more aspects of the sub-grantee project

I. On-Site Monitoring

A certain number of sub-grantees will be selected for on-site monitoring each year. The number of site visits will vary by funding program.

Monitoring is meant to assist subgrantees with any issues they are having. Programs can see positive outcomes from site visits:

- Improve the implementation and effectiveness of the program
- Provide assistance with performance monitoring
- Provide Resources (documents, training recommendations, etc.)
- Assist with providing county data through the state system
- Provide an objective view of your program that can offer suggestions
- Authoritative perspective and feedback for those who may not be listening to other team members
- Offer a connection to other programs with similar structures as a resource
- State learns the challenges facing programs to help advocate for those resources
- Reports could assist programs with County Board funding meetings
- Helps program demonstrate cost effectiveness
- Help identify other funding sources for the program
- Provide thoughts/feedback/assistance regarding sustainability

In some cases, monitoring is done in response to a perceived problem or concern. Some common problems that could necessitate a monitoring visit include:

- Untimely submission of progress and/or financial reports
- Expenditures in unauthorized budget categories
- Spending rate too fast/too slow
- Discrepancies between narratives and financial reports
- Delay in program start-up
- Unresponsiveness to requests for information
- Allegations of misuse of funds
- Audit exceptions requiring follow-up

II. Reporting Requirements

Reporting

The Department of Justice is required to submit reports to the Wisconsin Legislature and federal granting agencies which detail the types of projects funded and their effectiveness in meeting the program requirements. The source of the majority of information reported to the state and federal government is individual grantees through the submission of progress reports related to grant funded activities. Progress reports also provide a basis for discussion during on-site monitoring visits from your program manager.

How you will report will vary depending on the source of grant funds being used for your project. The appropriate reporting forms will be listed on your award documents. Reports will be due on the dates specified on the Acknowledgement Notice (final page of the grant award packet). Grants may be suspended if required reports are not provided in a timely matter. Expenditures will not be reimbursed if progress reports are overdue.

The following are programmatic reporting requirements for DOJ grantees:

1. Financial Reports

Financial reports are typically done on a quarterly or monthly basis. Financial reports are submitted through the G2 form and are due 12 days after the end of the reporting period.

2. Quarterly/Semi-Annual/Final Progress Reporting

Progress reports are typically done on a quarterly or semi-annual basis. Progress reports are submitted in Egrants and are due 12 days after the end of the reporting period.

3. Performance Measurement Platform (PMT) Reporting

PMT reports are done quarterly for some federal grants. Every three months they will be due in the Perfomance Measurement Platform Tool (PMT).

NOTE: You are encouraged to submit any information at any time that speaks to the success of your program. Publicity (news articles, awards, etc.), survey results and letters of support are always useful to your grant manager in understanding the impact of your project.

i. Financial Reporting

In order to obtain financial information concerning the use of federal funds, DOJ requires that recipients of these funds submit timely fiscal reports for review. The financial reports are also the mechanism to request reimbursement for costs incurred.

Submission Requirement

Financial reports must be submitted each time funds are awarded and at a minimum on the dates specified on the Acknowledgement Notice (final page of the grant award packet). <u>Future awards and fund draw-downs may be withheld if the financial report is delinquent.</u>

G-2 Forms Can Be Sent To:

Justice Programs Section Training and Standards Bureau 17 W. Main Street Madison, WI 53707-7070

Person Responsible for Fiscal Report Completion

<u>Please indicate the name and telephone number of the person responsible for completion of the fiscal report.</u>
This will enable DOJ fiscal staff to easily reach this person for answers to pertinent questions regarding this report (and hopefully expedite processing time!).

Official Signatures

G-2 Financial Reports must be signed and dated by <u>both</u> the Project Director and the Financial Officer of the project and the original document submitted. If persons in these positions have changed, please do a modification in Egrants to change the names.

Reconciliation of Confidential Funds

DOJ grant recipients of confidential funds must submit a Reconciliation of Confidential Funds Report, as well as a Confidential Funds Expenditure Report with the G-2 financial report. Failure to submit these reports may result in suspension of funding or termination of the grant.

Program Income Generated by Seizures & Forfeitures

For Drug Task Force grants, the Program Income Generated by Seizures & Forfeitures Report and the Program Income Expenditure Report must be submitted with the G-2 financial report. Instructions for completion of these reports may be found in the "Guidelines for Use of Program Income Generated by Seizures & Forfeitures" manual.

Uniform Crime Reporting

Law enforcement agencies required by state law, as direct providers, must submit Uniform Crime Reports (UCR) to DOJ by the 15th of each month. Grant funds will not be released to any recipient that is found to be delinquent in the submission of monthly Uniform Crime Reports. Temporary waiver of this requirement may be granted upon request of DOJ.

■ G-2 Financial Report

This is the financial reporting and fund request form for all justice programs. A sample G-2 form is located in the appendix of this guide. If the report is the final report, please check the final box. Recipients who have received funds in excess of their final actual expenditures will be notified in writing to reimburse DOJ for any overpayment.

- a) Financial Reports/Fund Requests (G-2) forms are due to DOJ within 12 days of the end of a quarter.
 - 1) Reports Due
 - i. 4/12 include January, February, and March activity
 - ii. 7/12 include April, May, and June acitivity
 - iii. 10/12 include July, August, and Septemebr acitivty
 - iv. 1/12 include October, November, and December acitivity
 - 2) A sample G-2 form is located in the appendix of this guide.

Inventory Report

For equipment grants, it may be necessary to complete an inventory report in Egrants. This report details the specific items purchased with grant funds.

ii. Program Reporting

The quarterly/semi-annual reports should be completed in Egrants. You will be asked about activity that occurred during the report period.

• Final Progress Report

i. Your final report will consist of your final period's report plus a summary of activities and accomplishments during the entire project period. Your final report should detail how all of the objectives in the approved work plan have been met, or if not met, an explanation of why not. You will also be asked to discuss, what, if anything, could have been done differently that might have enhanced the impact of the project or improved its operation.

iii. Performance Measurement Platform (PMT)

The PMT reports need to be completed quarterly and can be accessed at https://www.ojpsso.org/. If you need technical assistance related to the BJA website please contact the BJA Help Desk at BJAPMT@csrincorporated.com or call 1 (888) 252-6867.

To Log In

i. The WI DOJ will need to add you as a new user in PMT if you have never used PMT before. Once the individual is registered by WI DOJ they will receive an email allowing them to register.

After gaining access to the PMT website you will see a general information page with PMT Resources you may find useful as you move forward.



Subrecipient Awards

i. Once you press "Continue" you will view all "Subrecipient Awards" you have been attached to. The award number, amount, reporting period, and data entry status will be listed.



The grant status will be listed as "Not Started, In Progress, and Complete." A few weeks before the deadline for the PMT report you will receive a email from the DOJ regarding the upcoming due date.

Completing the PMT Report

i. Enter/Edit Data

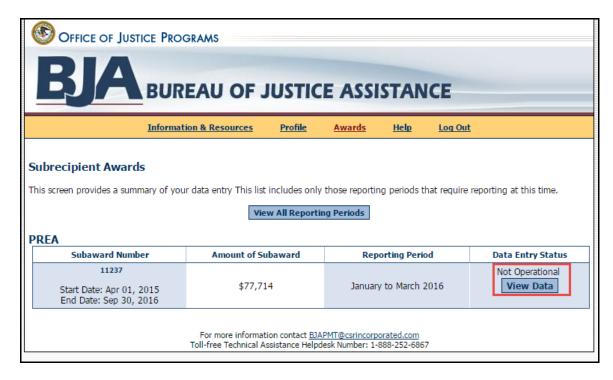
a) You will need to press the "Enter/Edit" button under Data Entry Status. You will be asked questions related to activites that occurred during the reporting period.

WI0556G	11671	Jan - Sep 16	\$45,397	Drug Treatment and Drug Courts	Not Started Enter/Edit Data
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b) Data is only considered complete and submitted when the Data Entry Status states "Complete." A Data Entry Status of "In Progress" will not be accepted.

ii. Not Operational

c) If you have not spent any money during the reporting period it is important to mark the grant as "Not Operational." You will still need to go into PMT and "Enter/Edit Data." When the questions ask whether there were any acitivites during the period, answer no and explain why. The PMT report will now be listed as "Not Operational."



iv. Other Reporting Requirements Requested by the Program (See Award Documents)

Grant Closeout Procedures

- i. Within 30 days of the end-date of the grant, the grantee must submit the following to DOJ:
 - o Final (or Annual) Progress Report
 - o Final G-2 Financial Report
 - o Inventory Report in Egrants (if applicable)

Final Refund

i. If the grantee received more funds than warranted given cash expenditures and obligations, the difference must be refunded to the State of Wisconsin - DOJ. In such an event, please send a check with your final G-2 Financial Report. Make the check payable to 'Wisconsin Department of Justice.'

III. Sanctions

If a recipient materially fails to comply with the terms and conditions of an award, whether stated in a federal statute, regulation, assurance, application, certification, or notice of award, DOJ may take one or more of the following actions, as appropriate in the circumstances:

- Temporarily withhold cash payments pending correction of the deficiency by the recipient
- Disallow (i.e. deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance
- Wholly or partly suspend or terminate awards for the project or program
- Withhold further awards for the project or program
- Take other remedies that may be legally available

Grant Termination

DOJ may terminate any project, in whole or in part, when a recipient materially fails to comply with the terms and conditions of an award or when the recipient and DOJ agree to do so. In the event that a project is terminated, DOJ will:

- Notify the recipient in writing of its decision
- Specify the reason
- Accord the recipient a reasonable time to terminate project operations
- Request the recipient seek support from other sources

A project which is prematurely terminated will be subject to the same requirements regarding audit, recordkeeping, and submission of reports as a project which runs for the duration of the project period.

IV. Grant Payments

Payment Process

DOJ processes grant payments on a reimbursement basis. The general turnaround for grant payments is 30 days upon the date of DOJ's receipt of a G-2 fund request form.

Withholding of Funds

In some instances, payment from DOJ may be held for a number of administrative reasons. Possible reasons for DOJ withholding funds include:

- Failure to submit timely progress reports
- Failure to complete PMT reports
- Un-cleared special conditions on the grant
- Improper/missing original signatures
- Incorrect budget information on the G-2 form
- Not including backup documentation

DOJ will work with the grantee to correct any of these issues to ensure payment as soon as possible. Please review your grant award carefully in order to meet all requirements and ensure prompt payment.

V. Grant Period/Availability of Funds

Obligations

An obligation occurs when funds are encumbered, through a valid purchase order or requisition to cover the cost of purchasing an authorized item on or after the start date and up to the last day of the grant period in the award. Any funds not properly obligated by the recipient within the grant award period will lapse and revert to the awarding agency. The obligation deadline is the last day of the grant award period unless otherwise stipulated. (Example: If the award period is 1/1/16 to 12/31/16, the obligation deadline is 12/31/16.) Subgrantees must complete performance during the obligation period (Example: DOJ could not approve funding for a conference in April 2016 if the grant period ended 12/31/15.) Performance as a result of a contract under a block/formula grant may be completed during the expenditure period not to exceed 60 days after the end date of the grant.

No additional obligations can be incurred after the end of the grant.

Expenditures

Funds which have been properly obligated by the end of the award period will have 30 days in which to be liquidated (expended). Any funds not liquidated at the end of the 30-day period will lapse and revert to DOJ.

Goods must be received and the services provided within the approved grant period. Project costs incurred before or after the approved grant period cannot be paid with grant funds.

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VI. Adjustments to Awards

All requests for programmatic and/or administrative budget changes must be submitted in Egrants for DOJ review and approval, prior to obligation, in a timely manner by the recipient. This is called a Modification Request. All requests for changes to the approved award shall be carefully reviewed by DOJ for both consistency with this guide and their contribution to project goals and objectives.

If the modification is not approved you will be notified. If the modification is approved the project director will received a signed Grant Adjustment Notice (GAN) in the mail.

I. Grant Commencement

If a project is not operational within first quarter of the original start date of the award period, the recipient must report by letter to DOJ the steps taken to initiate the project, the reasons for delay, and the expected start date.

If a project is not operational within first quarter of the original start date of the award period, the recipient must submit a second statement to DOJ explaining the implementation delay. Upon receipt of the 90-day letter, DOJ may cancel the project. DOJ may also, where extenuating circumstances warrant, extend the implementation date of the project past the 90-day period.

II. Types of Project Changes requiring DOJ approval

- Change in project site
- Change in key personnel
- Retirement of special conditions, if required
- Change in project period (no cost extension) is allowed
- Change in the scope of the programmatic activities
- Change to the project budget requiring prior approval

III. Change in Key Personnel

Key personnel are considered, at a minimum, the project director, financial officer and persons funded by the grant. Temporary changes of key personnel may be handled through a communication with DOJ rather than a formal modification process.

If the signing official changes during the project period you do not need to do a modification to update this information.

IV. Budget Changes

Transfers of funds between the major cost categories on your approved application budget may require the approval of DOJ. Budget line item transfers of less than 10% of the affected line items do not require prior approval if they do not materially alter the scope of the grant. Any budget change which materially alters the

project scope requires prior approval from DOJ. All changes in personnel and contractual services require prior approval from DOJ. Deviation from these requirements will make such expenditures subject to audit exception. All budget changes must be requested within the grant period. Retroactive budget changes will not be considered.

V. Grant Period Changes

Requests for changes in the award beginning- and end-dates may be requested from DOJ. Recipients must provide evidence that such extension is necessary and reasonable. Retroactive extensions will not be considered. In the event that funds have not been obligated by the end of the project period, the following criteria must be met by the recipient agency when submitting a request to extend the obligation deadline:

- a. Quarterly Reports (Fiscal and Narrative): All such reports must be up-to-date and satisfactory.
- b. **Special Conditions**: All special and general conditions attached to awards must be satisfied, except those conditions that must be fulfilled in the remaining period of the award. This includes the performance and resolution of audits and on-site monitor report findings in a timely manner.
- c. **Justification**: A narrative justification must be submitted with the extension request. Complete details must be provided, including the justification and the extraordinary circumstances which require the proposed extension. Explain the effect of a denial of the request on the project.
- d. When to File Extension Request: All requests for extension must be made at least one month prior to the end of the original obligation (award period) deadline for the grant.

VI. Program Income

Program income means gross income earned by the recipient, during the funding period, as a direct result of the award. Direct result is defined as a specific act or set of activities that are directly attributable to grant funds and which are directly related to the goals and objectives of the project.

VII. Interest Income

Interest income should be treated and reported as program income. Refer to specific program guidelines on interest income.

VIII. Royalties

The recipient shall retain all royalties received from copyrights or other works developed under projects or from patents and inventions, unless the terms and conditions of the project provide otherwise or a specific agreement governing such royalties has been negotiated between DOJ and the recipient.

IX. Asset Seizures and Forfeiture Income

Income received from the sale of seized and forfeited assets (personal or real property) or from seized and forfeited money shall follow the Addition Method of handling program income. The following policies apply to program income from asset seizures and forfeitures:

- Program income, with the approval of DOJ, may be retained by the entity earning the program income or used by the recipient for any purpose that furthers the objectives of the legislation under which the grant was made.
- Program income earned in an anti-drug abuse task force operation must remain within the task force, even if a unit of government no longer participates in the task force or a change of lead agency occurs.
- State or local units of government may use program income funds from seized and forfeiture assets as match when assets are adjudicated by a state court, in accordance with state law. In addition, state and local units of government MAY use cash received under the equitable sharing program for the non-Federal portion (match) of program costs, as provided for in the guidelines established by the DOJ Asset Forfeiture Office, when the assets are adjudicated by a federal court.
- There are no federal requirements governing the disposition of program income earned after the end of the funding period unless the terms of the award or DOJ's regulations provide otherwise. **Program income** from asset seizures and forfeitures is considered earned by the project at the time of the seizure, and is available for use by the recipient upon forfeiture.

Refer to the "DOJ Guidelines for Use of Program Income Generated by Seizures and Forfeitures" manual.

X. Other Guidelines

In the absence of other restrictions on disposition contained within the award or the terms and conditions of the project, program income shall be added to the funds committed in the agreement (Addition Method of handling program income). The program income shall be used by the recipient for any purpose that furthers the broad objectives of the legislation under which the award was made (i.e. expanding the project or program, continuing the project or program that furthers the broad objectives of the State, obtaining equipment or other assets needed for the project or program or for other activities that further the statute's objectives).

XI. Program Income Accountability

All income generated as a direct result of an agency funded project shall be deemed program income. Program income must be reported to DOJ and used for the purposes and under the conditions applicable to the award. Program income costs follow the same allowability criteria as the federal grant funds. The federal portion of program income must be accounted for up to the same ratio of federal participation as funded in the project.

For example:

- A grant was funded by 100% federal funds, and must account for and report on 100% of the total program income earned. The total program income earned was \$20,000 and the recipient must account for and report \$20,000 as program income on the financial report.
- A grant was funded by 75% federal funds and 25% non-federal funds. The total program income earned by the grant was \$100,000 of which \$75,000 must be accounted for and reported by the recipient as program income on the financial report.

D. Award Conditions

I. Conditions of Award and Acceptance

i. The Grant Award

After completion of the review process, applications designated for approval are formally issued a Grant Award. This document includes:

- Name of recipient
- Grant period
- Type of federal/state funds
- Amount federal funds or state funds
- Grant number
- Reporting requirements
- Special conditions, as appropriate, that the grantee must meet if the award is accepted

A grant award document is broken down into 3 main sections:

<u>Signature Page</u>. This page details the name of the grantee, grant number, type of Federal funds, and end-date of the grant. This page must be signed by the authorized signing officials of both DOJ and the grantee agency.

Attachments A, B, and/or C. These attachments detail the grant period, approved budget, and any general or special conditions of the grant.

<u>Acknowledgement Notice</u>. This section details the reporting requirements expected of the grantee, and must be signed by the Project Director.

A sample grant award document can be found in the appendix of this guide.

ii. Award Notification and Acceptance

Upon approval, DOJ will process and send the grantee **two** copies of signed grant award documents. Upon receipt, the grantee will have 30 days to do the following:

- 1. Read the entire grant award carefully
- 2. Contact DOJ with any questions
- 3. Obtain the signature and initials of the authorized official and project director and indicated (both copies)
- 4. Mail **one** copy of the award documents back to DOJ (the other copy is kept for the grantee's records)
- 5. Create a grant file to keep back up documententaion (Progress reports, expenditures, etc.) See section ____ for more details

Upon DOJ's receipt of the returned award document with all original signatures, the grant is considered to be active.

iii. Authorized Signatures for Grant Awards

For local units of government, DOJ requires that grant award documents are signed by the highest elected official.

These individuals are typically:

Cities: Mayor or City Manager

Counties: County Board Chairperson or County Executive

For Non-Profit Organizations the officers or employees authorized to sign contracts is typically detailed in the by-laws of the organization.

Letters of Commitment do not require signatures from sub-grantees.

If the signing official changes between the time you receive your award document and the contract is signed and returned, you should cross out the signing official name, print the new signing official's name for signature, and initiate a grant modification in Egrants.

iv. Commencement of Grant Activities

Grant activities and related expenditures may not begin until the agreed upon start date of the grant and all contract documents have been signed and returned.

v. Special Conditions of Award

In some instances, a grant may contain Special Conditions. These are conditions that the grantee must meet in addition to general conditions associated with the grant. Some examples of special conditions include:

Need for Revised Budget

In the event that a grant project is approved at a different amount than applied for, or if a certain section of the requested budget is removed, DOJ may require a revised budget be submitted before disbursing funds.

Grant Extensions

Some grant periods may be contingent upon the end-date of the federal grant award. In this case, a condition may state that an extension of the grant end date will be made pending DOJ receiving an extension of the federal grant award.

Submission of Required Forms

In some cases, required forms may not have been submitted to DOJ during the grant application process. These could include certification forms, contracts, or other grant-related forms. All required forms need to be submitted before DOJ will disburse funds.

vi. Programmatic Concerns

Certain grants may require specific programmatic conditions, such as goals that must be met or certifications that an activity has been completed. Evidence of these conditions must be shown before the grant can be closed out.

Please read Attachment A and/or B of your grant award closely for any Special Conditions. Work with DOJ to clear them as soon as possible, in order to ensure compliance with all grant requirements and allow timely grant payments.

vii. Certifications

Federal regulations require that recipients of federal funds provide certifications regarding:

Lobbying Debarment, Suspension, and Other Responsibility Matters Drug-Free Workplace Requirements

viii. Certified Assurances

Sample forms are located in the appendix of this guide.

DOJ will provide you with the appropriate forms to be completed as part of the grant process. Applicant agencies should carefully read these forms prior to signing. **Applicant agencies should contact DOJ for more information or clarification.**

II. Travel Guidelines

Travel guidelines for DOJ-funded grants use State of Wisconsin travel policies, as required by 2 CFR Part 225 (formerly OMB A-87). Costs incurred beyond the state rates are the responsibility of the sub-grantee.

i. Meal Reimbursement Rates

MEAL	LEAVE BEFORE	RETURN AFTER	IN-STATE MAX	OUT-STATE MAXIMUM
Breakfast	6:00 AM	NA	\$8.00	\$10.00
Lunch	10:30 AM	2:30 PM	\$10.00	\$15.00
Dinner	NA	7:00 PM	\$20.00	\$25.00

- Out of State Maximums apply for any out-of-state location.
- On any day that an employee is entitled to reimbursement for two or more consecutive meals, the employee may exceed the maximum for one or more meals, provided that the total amount claimed does not exceed the maximum reimbursement rate for all eligible meals. Each day is considered separately for application of this policy.
- No reimbursement is allowed for alcoholic beverages.
- Maximums listed include tax and gratuity.

ii. Mileage Reimbursement Rates

MODE OF TRANSPORTATION	ALLOWABLE REIMBURSEMENT
Automobile	\$0.51 /mile as of July 1,2012
Airfare	Coach fare at lowest rate available
Vehicle Rental	Economy car, must have collision damage and liability insurance (reimbursable)

iii. Lodging Rates

PER NIGHT LODGING (EXCLUDES TAX)	MOST IN- STATE	MILWAUKEE, WAUKESHA & RACINE COUNTIES	OUT OF STATE
Maximum Reimbursement per Night	\$82.00	\$90.00	See Below

- Reimbursement is limited to the single rate for a single room, located outside the traveler's Headquarters City
 - o Lodging receipts must be retained
- Out of State Lodging: All government rates should be sought for standard room only. Maximum reimbursements for out of state lodging can be found at https://www.doj.state.wi.us/sites/default/files/Out%20of%20State%20Travel%20Rates.pdf
- **Documented Conference Site**: Lodging costs may exceed the maximum permitted amount when staying at a documented conference site, on the basis that it enables the employee(s) to gain professional benefits due to interaction with other attendees. A copy of the hotel folio and conference agenda must be provided.

iv. Other Incidental Travel Reimbursement Rates

ITEM	ALLOWABLE REIMBURSEMENT
	Not to exceed \$2.00 per night, plus \$2.00 per day of arrival & \$2.00 per day of
Hotel Gratuity	departure
Airport Porterage	Not to exceed \$1.00 per piece of luggage
Taxi, shuttle	One-way trips over \$25 require a receipt
Luggage Fees	Actual Cost, Receipt is required. The number of bags must be reasonable for the business purpose of the trip.
Registration Fee	Actual Cost, Receipt is required
Parking costs or tolls	Receipt when claims exceed \$25 & whenever possible (ie: parking ramp w/attendant)

III. Costs

The cost section deals with general allowability of costs. For specific cost information, refer to general funding guidelines for each specific federal program administered by DOJ.

i. Determination of Allowability

To be allowable under a grant program, costs must meet the following general criteria:

- Be necessary and reasonable for proper and efficient administration of the grant programs
- Be allocable to federal awards under the provisions of the applicable circular
- Be authorized or not prohibited under state or local laws or regulations
- Conform to any limitations or exclusions set forth in these principles, federal laws, terms and conditions
 of the grant award, or other governing regulations as to types or amounts of cost items
- Be consistent with policies, regulations, and procedures that apply uniformly to both federal awards and other activities of the governmental unit
- Be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any
 other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as
 an indirect cost
- Be determined in accordance with generally accepted accounting principles
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federal award in either the current or a prior period, except as specifically provided by Federal law or regulation.
- Be net of all applicable credits
- Be adequately documented
- Be paid, or obligated, for services provided during the grant period
- Be paid, if obligated by the end of the grant period, within 60 days of the grant period ending date

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IV. Allowable Costs

Allowable costs are those costs identified in the circulars mentioned <u>here</u>, in addition to program guidelines that may be more specific. In addition, costs must be reasonable, allocable, necessary to the project, and comply with the funding requirements.

i. Publications

All written, visual, or audio materials publicizing or resulting from award activities shall contain an acknowledgement of the awarding agency assistance. An acknowledgement of support shall be made through use of the following or comparable footnote: "This project was supported by Award No. ______ awarded by the (name of specific office/bureau), Office of Justice Programs." If the awarding agency is not OJP, language should reflect the proper agency name.

ii. Costs Requiring Prior Approval:

- **Pre-Agreement Costs**: Prior approval is required for pre-agreement costs.
- Indirect Costs: If allowed under specific program guidelines, a copy of the Cost Agreement should be submitted to DOJ.
- Consultant Rates: Compensation for individual consultant services is to be reasonable and consistent with that paid for similar services in the marketplace. Consideration will be given to compensation including fringe benefits for those individuals whose employers do not provide the same. In addition, when the rate exceeds \$650 (excluding travel and subsistence costs) for an eight-hour day, a written PRIOR APPROVAL is required from DOJ. Prior approval requests require additional justification. An eight-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance. Please note, however, that this does not mean that the rate can or should be \$650 for all consultants. Rates should be developed and reviewed on a case-by-case basis and must be reasonable and allowable in accordance with OMB cost principles. Approval of consultant rates, in excess of \$650 a day, that are part of the original application with appropriate justification and supporting data will be approved on a case-by-case basis. If consultants are hired through a competitive bidding process (not sole source), the \$650 threshold does not apply.

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V. Unallowable Costs

This section deals in general with unallowability of costs. For specific information, refer to general funding requirements for each specific federal program administered by DOJ.

i. Alcoholic Beverages

Costs of alcoholic beverages are unallowable.

ii. Bad Debts

Any losses arising from uncollectible accounts and other claims, and related collection and legal costs, are unallowable.

iii. Bonuses or Commissions

The recipient is prohibited from paying any bonus or commission to any individual or organization for the purpose of obtaining approval of an application for award assistance. Bonuses to officers or board members of profit or non-profit organizations is determined to be a profit or fee and is unallowable.

iv. Compensation of Federal Employees

Salary payments, consulting fees, or other remuneration of full-time federal employees are unallowable costs.

v. Conferences and Workshops

Unallowable costs include: entertainment, sports, visas, passport charges, tips, bar charges, beverages, alcoholic beverages, laundry charges, meal service, honorarium, etc.

vi. Contingencies

Contributions to a contingency reserve or any similar provision made for events the occurrence of which cannot be foretold with certainty as to time, intensity, or with an assurance of their happening, are unallowable.

vii. Contributions and Donations

Contributions and donations by the organization to others are unallowable.

viii. Dual compensation

In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government AND from an award for a single period of time (e.g., 1 p.m. to 5 p.m.) even though such work may benefit both activities.

ix. Entertainment

Costs of entertainment, including amusement, diversion, social activities, ceremonials, and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable.

x. Fines and Penalties

Costs of fines, penalties, damages, and other settlements resulting from violations (or alleged violations) of, or failure of the organization to comply with, federal, state, local, or tribal laws and regulations are unallowable.

xi. Fund Raising

Costs of organized fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions, may not be charged either as direct or indirect costs against the award. Neither the salary of persons engaged in such activities nor indirect costs associated with those salaries may be charged to the award.

An organization may accept donations (i.e. goods, space, services) as long as the value of the donations is not charged as a direct or indirect cost to the award.

Nothing in this section should be read to prohibit a recipient from engaging in fund raising activities as long as such activities are not financed by federal or non-federal award funds.

xii. General Government Expenses

The general costs of government are unallowable. These include:

- Salaries and expenses of the Office of the Governor of a State, or the chief executive of a political subdivision, or the chief executive of federally-recognized Tribal governments
- Salaries and other expenses of state legislatures, Tribal councils, or similar local governmental bodies (such as county supervisors, city councils, school boards), whether incurred for purposes of legislation or executive direction.
- Cost of the judiciary branch of government
- Cost of prosecutorial activities unless treated as a direct cost to a specific program when authorized by program regulations

• Other general types of government services normally provided to the general public, such as fire and police, unless provided for as a direct cost in program regulations

For federally-recognized tribal governments and Councils of Governments (COGs), the portion of salaries and expenses directly attributable to managing and operating federal programs by the chief executive and his staff is allowable.

xiii. Honorariums

Payments for services on which no fee is set or legally obtainable are not allowable.

xiv. Imputed Interest

Cost of money as an element of the cost of facilities capital, Cost Accounting Standards (CAS) 414, imputed interest, is not allowed.

xv. Interest

Costs incurred for interest on borrowed capital or the use of a governmental unit's own funds, however represented, are unallowable.

xvi. Land Acquisition

The funding legislation specifies that no award involving the renting, leasing, or construction of buildings or other physical facilities shall be used for land acquisition. Accordingly, land acquisition costs are unallowable.

xvii. Lobbying

The cost of certain influencing activities associated with obtaining grants, contracts, cooperative agreements, or loans is an unallowable cost. Lobbying with respect to certain grants, contracts, cooperative agreements, and loans shall be governed by the common rule, "New Restrictions on Lobbying" published at 55 FR 6736 (Feb. 26, 1990).

xviii. Military Type Equipment

Costs for such items as armored vehicles, explosive devices, and other items typically associated with the military arsenal, excluding automatic weapons, are unallowable.

xix. State and Local Sales Taxes

These are unallowable when the government assesses taxes upon itself or disproportionately to federal programs. An example of an unallowable tax would be if the government levied taxes as a result of federal funding. An example of an allowable sales tax would be user taxes, such as gasoline tax. These provisions became effective as of the government's fiscal year beginning on or after January 1, 1998.

xx. Travel of Federal Employees

Costs of transportation, lodging, subsistence, and related travel expenses of employees are unallowable.

xxi. Underrecovery of Costs Under Grant Agreements

Any excess of cost over the federal contribution under one grant agreement are unallowable under other grant agreements.

Unallowable costs are those identified in the circulars mentioned here.

VI. Property and Equipment

i. Acquisition of Property

Recipients are required to be prudent in the acquisition and management of property with federal funds. Expenditure of funds for the acquisition of new property, when suitable property required for the successful execution of projects is already available within the recipient organization, will be considered an unnecessary expenditure.

ii. Loss, Damage, or Theft of Equipment

Recipients are responsible for replacing or repairing the property which is willfully or negligently lost, stolen, damaged, or destroyed. Any loss, damage, or theft of the property must be investigated and fully documented and made part of the official project records.

iii. Equipment Acquired with JAG Funds

Equipment acquired shall be used and managed to ensure that the equipment is used for criminal justice purposes. Standards and procedures governing ownership, use, management, and disposition are as follows:

■ <u>Title</u>: The Omnibus Crime Control and Safe Streets Act of 1968, as amended, requires that the title to all equipment and supplies purchased with funds made available under the Crime Control Act shall vest in the criminal justice agency or nonprofit organization that purchased the property if it certifies to the state office that it will use the property for criminal justice purposes. If such written certification is not made, title to the property shall vest in the state office, which shall seek to have the equipment and supplies used for criminal justice purposes elsewhere in the state prior to using it or disposing of it in any other manner.

It is the intent of federal legislation that where equipment is purchased with task force monies, this equipment must remain within the task force, even if a unit of government no longer participates in the task force or a change of lead agency occurs.

- <u>Use and Management</u>: A recipient shall use and manage equipment in accordance with their own procedures as long as the equipment is used for criminal justice purposes.
- <u>Disposition</u>: When equipment is no longer needed for criminal justice purposes, a state shall dispose of equipment (for both state and for recipients), in accordance with state procedures.

iv. Equipment Acquired with Juvenile Justice Act Formula Funds

Equipment acquired under an award shall be used and managed to ensure that the equipment is used for criminal justice purposes. Standards and procedures governing ownership, use, management, and disposition are as follows:

- <u>Title</u>: Title to equipment acquired under an award will vest upon acquisition in the recipient subject to the obligations and conditions set forth in 28 CFR Part 66.
- <u>Use</u>: Recipients shall use equipment in accordance with the following requirements:
 - Equipment must be used by the recipient in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a federal Agency.
 - The recipient shall also make equipment available for use on other projects or programs currently or previously supported by the federal government, providing such use does not interfere with the work on the projects or programs for which it was originally acquired. First preference for other use shall be given to other programs or projects supported by DOJ. User fees should be considered, and treated as program income to the project, if appropriate.
 - Notwithstanding program income, the recipient shall not use equipment acquired with funds to provide services for a fee to compete unfairly with private companies that provide equivalent services, unless specifically permitted or contemplated by federal statute.
 - When acquiring replacement equipment, recipients may use the equipment to be replaced as a trade-in or sell the equipment and use the proceeds to offset the cost of the replacement equipment subject to the written approval of DOJ.
- <u>Management</u>: Procedures for managing equipment (including replacement) whether acquired in whole or in part with grant funds will, at a minimum, meet the following requirements:
 - Property records must be maintained which include: a description of the property, a serial number or other identification number, source of the property, identification of who holds the title, acquisition date, cost of the property, the percentage of federal participation in the cost of the property, location of property, use and condition of the property, and disposition data including the date of disposal and sale price.
 - A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
 - A control system must exist to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated by the recipient.
 - Adequate maintenance procedures must exist to keep the property in good condition.

- If the recipient is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.
- <u>Disposition</u>: Recipients shall dispose of the equipment when original or replacement equipment acquired under the award is no longer needed for the original project or program, or for other activities currently or previously supported by a federal agency. DOJ must be notified of all equipment dispositions.

Disposition of the equipment will be made as follows:

- Items with a current per unit fair market value of less than \$5,000 may be retained, sold, or otherwise disposed of with no further obligation to DOJ.
- Items with a current per unit fair market value in excess of \$5,000 may be retained or sold and DOJ shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by DOJ's share of the equipment. The seller is also eligible for sale costs.
- In cases where a recipient fails to take appropriate disposition actions, DOJ may direct the recipient to take excess and disposition actions.

v. Replacement of Property (Equipment and Non-Expendable Personal Property)

When an item of property is no longer efficient or serviceable but the recipient/sub-recipient continues to need the property, the recipient/sub-recipient may replace the property through trade-in or sale and subsequent purchase of new property, provided the following conditions are met:

Similar Function

a) Replacement property must serve the same function as the original property and must be of the same nature or character, although not necessarily of the same grade or quality.

Credits

a) Value credited for the property, if the property is traded in, must be related to its fair market value.

Time

a) Purchase of replacement property must take place soon enough after the sale of the property to show that the sale and the purchase are related.

Compensation

a) When acquiring replacement property, the recipient/sub-recipient may use the property to be replaced as a trade-in or the proceeds from the sale of the property to offset the cost of the new property.

Prior Approval

a) State sub-recipients shall obtain the written permission of the state to use the provisions of this section prior to entering into negotiation for the replacement or trade-in of property.

vi. Retention of Property Records

Records for equipment, non-expendable personal property, and real property shall be retained for a period of three years from the date of the disposition or replacement or transfer at the discretion of the awarding agency. If any litigation, claim, or audit is started before the expiration of the three-year period, the records shall be retained until all litigations, claims, or audit findings involving the records have been resolved.

vii. Supplies

- <u>Title</u>. Title to supplies acquired under an award or sub-award vests, upon acquisition, in the recipient or sub-recipient, respectively.
- <u>Disposition</u>. If there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate fair market value upon termination or completion of the funding support and the supplies are not needed for any other federally-sponsored programs or projects, the recipient or sub-recipient shall compensate the awarding agency for its share. The amount of compensation shall be computed in the same manner as for non-expendable personal property or equipment.

viii. Copyrights

The awarding agency reserves a royalty-free, non-exclusive, and irrevocable license to reproduce, publish, or otherwise use, and authorize others to use, for federal government purposes:

- a) The copyright in any work developed under an award or sub-award; and
- b) Any rights of copyright to which a recipient or sub-recipient purchases ownership with support

VII. Procurements

i. Standards

Recipients shall use their own procurement procedures and regulations, provided that the procedures conform to applicable federal law and the standards identified in the Procurement Standards Section of 28 CFR Parts 66 and 70 (Circular OMB A-110). Any recipient (state or local) whose procurement system has been certified by a federal agency is not subject to prior approval requirements of 28 CFR Parts 66 and 70. DOJ's prior approval will only be required for areas beyond limits of the recipient certification.

ii. Adequate Competition

All procurement transactions whether negotiated or competitively bid and without regard to dollar value, shall be conducted in a manner so as to provide maximum open and free competition.

iii. Non-Competitive Practices

The recipient shall be alert to organizational conflicts of interest or non-competitive practices among contractors which may restrict or eliminate competition or otherwise restrain trade. Contractors that develop or draft specifications, requirements, statements of work, and/or Requests for Proposals (RFPs) for a proposed procurement shall be excluded from bidding or submitting a proposal to compete for the award of such procurement. An exemption to this regulation requires the prior approval of DOJ and is only given in unusual circumstances such as when a non-profit organization is acting as the agent for the state or local unit of government. Any request for exemption must be submitted in writing to DOJ.

VIII. Conflict of Interests

Personnel and other officials connected with agency funded programs shall adhere to the following requirements:

i. Advice

No official or employee of the state or unit of local government or of non-governmental recipients shall participate personally through decisions, approval, disapproval, recommendation, the rendering of advice, investigation, or otherwise in any proceeding, application, request for a ruling or other determination, contract, award, cooperative agreement, claim, controversy, or other particular matter in which award agency funds (including program income or other funds generated by federally funded activities) are used, where to his/her knowledge, he/she or his/her immediate family, partners, organization other than a public agency in which he/she is serving as an officer, director, trustee, partner, or employee or any person or organization with whom he /she is negotiating or has any arrangement concerning prospective employment has a financial interest or less than an arms-length transaction.

ii. Appearance

In the use of DOJ project funds, officials or employees of state or local units of government and non-governmental recipients shall avoid any action which might result in or create the appearance of:

- Using his/her official position for private gain
- Giving preferential treatment to any person
- Losing complete independence or impartiality
- Making an official decision outside official channels
- Affecting adversely the confidence of the public in the integrity of the government or the program

IX. Civil Rights/EEOP Guidelines

As a requirement of federal Office of Justice Programs (OJP) funding, DOJ is required to ensure that recipients of financial assistance from DOJ and its components are not engaged in prohibited discrimination. The primary objective in accomplishing this mission is to secure prompt and full compliance with all civil rights laws and regulations so that needed Federal assistance may commence or continue.

Before you apply for a grant, please note that DOJ has two main processes in place to ensure compliance, which will be detailed in all grant announcements that utilize federal OJP funds. These processes are:

- Ensure that all sub-grantees submit to OCR an <u>EEOP Certification Form</u>, and submit a copy to WI DOJ to maintain on file, unless they are required to submit a full EEO Plan or the short form to OCR over \$500,000). This form will be included as part of your award document package. Grantees will be expected to submit this form directly to the federal OJP Office for Civil Rights, and send a copy back to DOJ as part of the award document package.
- Ensure that all sub-grantees complete the <u>Civil Rights Compliance Questionnaire</u>, and work with the agency to correct any issues as a result of their responses to this form. If you receive a grant from DOJ, this form will be collected as part of your first quarterly program report in Egrants. You will be expected to fill out this Questionnaire and attach it in Egrants as part of this report.

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i. Equal Employment Opportunity Plan (EEOP) Requirement For Sub-Grantees Receiving U.S. Department of Justice Grant Funds

The following information is required to determine whether the grantee

- a) is exempt from EEOP development,
- b) must have an approved EEOP on file or must submit an EEOP directly to the Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice.

What is the recipient type?	What is the award amount?	What is the number of employees?	Does the recipient need to develop an EEOP?	Does the recipient need to submit a Certification Form to OCR?	Must the recipient submit an EEOP to OCR?
Nonprofit, Indian Tribe, Medical or Education Institution	Does not matter	Does not matter	NO	YES (Section A)	NO
State or local government and private entity	Less than \$25,000	Does not matter	NO	YES (Section A)	NO
State or local government and private entity	Does not matter	Less than 50 employees	NO	YES (Section A)	NO
State or local government and private entity	\$25,000 or more, but less than \$500,000, for an individual grant	50 or more employees	YES	YES (Section B) Certifying that the recipient has created an EEOP and is maintaining it on file in a designated office for review by employees, applicants, OCR, or a state administrative agency	NO
State or local government and private entity	\$500,000 or more for an individual grant	50 or more employees	YES	NO	Y

For assistance in developing an EEOP, contact a Compliance Specialist at the Office for Civil Rights, (202) 307-0690 or visit this Frequently Asked Questions page http://www.ojp.usdoj.gov/about/ocr/faq_eeop.htm#8

X. Financial Management Standards

All recipients are required to establish and maintain accounting systems and financial records to accurately account for funds awarded to them. These records shall include both federal funds and all matching funds of state, local, and private organizations, when applicable.

i. Accounting System

The recipient is responsible for establishing and maintaining an adequate system of accounting and internal controls for itself. An acceptable and adequate accounting system:

- Presents and classifies projected historical cost of the grant as required for budgetary and evaluation purposes
- Provides cost and property control to assure optimal use of funds
- Controls funds and other resources to assure that the expenditure of funds and use of property are in conformance with any general or special conditions of the recipient
- Meets prescribed requirements for periodic financial reporting of operations
- Provides financial data for planning, control, measurement, and evaluation of direct costs

ii. Accounting System Standards

The recipient is responsible for establishing and maintaining an adequate accounting system and internal controls. Accounting systems are made up of a series of operations which involve classifying, recording, summarizing, and reporting transactions. Elements of the system must consist of an accounting structure, accounting records, source documents, a system for coding financial transactions, and written procedures prescribing the manner in which and by whom these operations are performed. A recipient's accounting system must include the following:

- System coding or classification must permit summarization and reporting of grant expenditures by specific programs, projects, uniform receipt and expenditure classifications
- Accounting records should adequately identify the receipt and expenditure of each recipient or contractor
- Accounting records, which must include a ledger and supporting books of account, should refer to subsidiary records or documentation which support each entry and which can be readily located and identified with the grant
- Accurate, current, and complete financial reporting information
- Systems integration with an adequate system of internal controls to safeguard grant funds and properties, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence by the recipient to prescribed management policies

iii. Commingling of Funds

The accounting systems of all recipients must ensure that agency funds are not commingled with funds from other federal agencies. Each award must be accounted for separately. Recipients are prohibited from commingling funds on either a program-by-program basis or a project-by-project basis. Funds specifically budgeted and/or received for one project may not be used to support another.

iv. Minimization of Cash Balance

Recipient organizations should request funds based upon immediate disbursement requirements. DOJ policy is to make grant payments on a reimbursement basis. Requests for terms other than reimbursement will be considered on a case-by-case basis. Recipients must ensure that cash on hand is kept at a minimal balance.

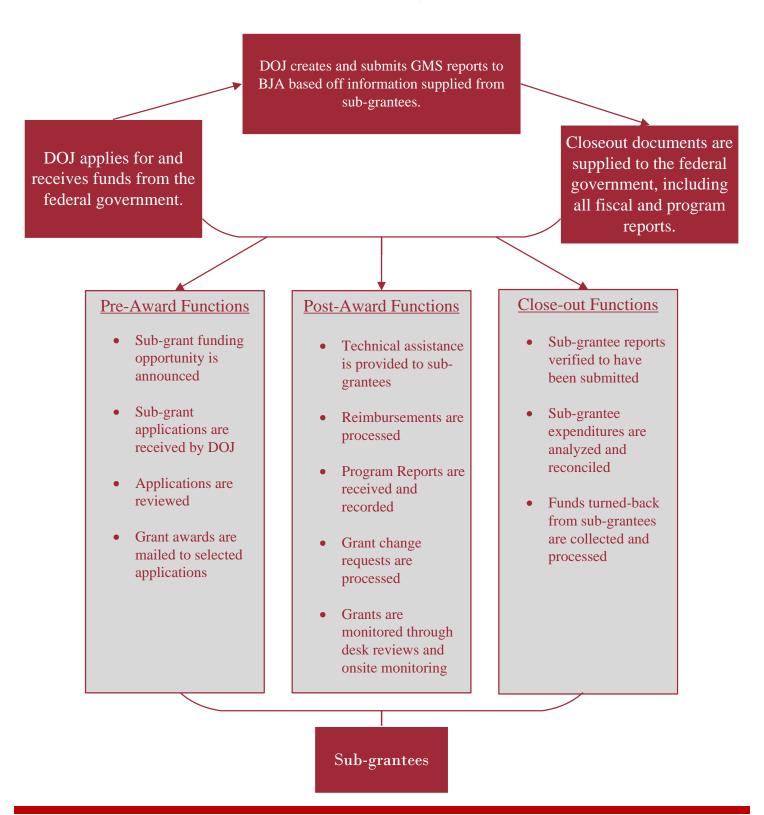
v. Special Conditions

The recipient must provide written documentation that shows that any General and Special Conditions to the grant award have been met. Failure to meet any of the General and Special Conditions, unless specifically waived in writing, may result in the disallowance of all award expenditures and the return of all state and federal funds to DOJ or nonpayment until conditions are met.

vi. Supplanting

A written certification may be requested by DOJ showing that federal funds will not be used to supplant state or local funds. Federal funds must be used to supplement existing funds for program activities, and not replace those funds which have been appropriated for the same purpose. If there is a potential presence of supplanting, the recipient will be required to supply documentation demonstrating that the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

<u>Justice Programs</u>



E. Retention /Access Requirements for Records and Audits	

I. Retention and Access for Records

i. Retention of Records

In accordance with 28 CFR Parts 66 and 70, all financial records, supporting documents, statistical records, and all other records pertinent to awards shall be retained by each organization participating for <u>at least three years</u> following the closure of their most recent audit report. Retention is required for purposes of federal examination and audit. Records may be retained in automated format.

Coverage:

The retention requirement extends to books of original entry, source documents supporting accounting transactions, the general ledger, subsidiary ledgers, personnel and payroll records, canceled checks, and related documents and records. Source documents include copies of all awards, applications, and required recipient financial and narrative reports. Personnel and payroll records shall include the time and attendance reports for all individuals reimbursed under the award, whether they are employed full-time or part-time. Time and effort reports are also required for consultants.

Retention Period:

The three-year retention period starts from the date of the submission of the closure of the most recent single audit report which covers the grant period. If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it or until the end of the regular three-year period, whichever is later.

ii. Maintenance

Recipients of funds are expected to see that records of different grants are separately identified and maintained so that information desired can be readily located. Recipients are also obligated to protect records adequately against fire or other damage. When records are stored away from the recipient's principal office, a written index of the location of records stored should be on hand and ready access should be assured.

iii. Access to Records

The awarding agency includes the funding agency, the federal agency, the Department of Justice Office of the Inspector General and the Comptroller General of the United States, or any of their authorized representatives, shall have the right to access any pertinent books, documents, papers, or other records of recipients which are pertinent to the award, in order to make audits, examinations, excerpts, and transcripts. The right of access must not be limited to the required retention period but shall last as long as the records are retained.

II. Audits

The intent of this section is to identify the policies for determining the proper and effective use of public funds rather than to prescribe detailed procedures for the conduct of an audit.

i. Audit Requirement

Non-federal entities that expend \$500,000 or more of federal awards in a year shall have a single or program-specific audit conducted for that year in accordance with the provisions outlined in the <u>Electronic Code of Federal Regulations</u>. Non-federal entities that expend less than \$500,000 a year in federal awards are exempt from federal audit requirements for that year, unless stated otherwise in the reglations, but records must be available for review or audit by appropriate officials of the federal agency, pass-through entity, and General Accounting Office (GAO).

ii. Audit Costs

The prorated costs of audits made in accordance with the provisions of OMB Circular A-133 are allowable charges to federal awards. A non-federal entity shall not charge the cost of auditing a non-federal entity which has federal awards expended of less than \$500,000 per year and is thereby exempted under S_.200(d) from having an audit conducted. However, this does not prohibit DOJ from securing the services of auditors to conduct a limited-scope audit to monitor the activities of recipients as necessary, to ensure that federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements, and that performance goals are achieved.

iii. Audit Objectives

Awards are subject to conditions of fiscal, program, and general administration to which the recipient expressly agrees. Accordingly, the audit objective is to review the recipient's administration of funds and required non-Federal contributions for the purpose of determining whether the recipient has:

- Established an accounting system integrated with adequate internal fiscal and management controls to
 provide full accountability for revenues, expenditures, assets, and liabilities. This system should provide
 reasonable assurance that the organization is managing federal financial assistance programs in
 compliance with applicable laws and regulations
- Prepared financial statements which presented fairly, in accordance with generally accepted accounting principles
- Prepared financial reports which contain accurate and reliable financial data, and are presented in accordance with the terms of applicable agreements
- Expended federal funds in accordance with the terms of applicable agreements and those provisions of federal law or regulations that could have a material effect on the financial statements or on the awards tested

iv. Audit Reporting Requirements

Independent auditors should follow the requirements prescribed in the circulars.

Audit reports are due to the Federal Clearinghouse no later than <u>nine months</u> after the end of the recipient's fiscal year.

DOJ's sub-grantee audit coordination is done through the Wisconsin Department of Justice.

If an auditor becomes aware of illegal acts or other irregularities, prompt notice shall be given to recipient management officials above the level of involvement. The recipient, in turn, shall promptly notify DOJ and the cognizant federal agency of the illegal acts or irregularities and of proposed and actual actions, if any.

v. Failure to Comply

Failure to have audits performed as required may result in the following:

- a. Withholding a percentage of federal awards until the audit is completed satisfactorily
- b. Suspending federal awards until the audit is conducted
- c. Terminating the federal award

vi. Audit Resolution

Timely action on recommendations by responsible management officials is an integral part of the effectiveness of an audit. Each recipient shall have policies and procedures for responding to audit recommendations.

vii. Top Ten Audit Findings

- 1) Untimely report submissions
- 2) Lack of documentation
- 3) Inadequate monitoring of sub-recipients
- 4) Inadequate time/effort reports
- 5) Inaccurate reports (Financial Status Reports and Requests for Payment)
- **6)** Commingling of funds
- 7) Excess cash on hand
- 8) Unallowable costs
- 9) Inappropriate changes
- **10)** Conflicts of interest

F. Resources

Wisconsin Department of Justice Grants Website

This website provides information on current funding opportunities.



DOJ Egrants System

This web-based program gives DOJ staff and DOJ customers a more efficient way to announce funding opportunities, apply for grants, manage grant awards and monitor project progress.



Egrants Technical Assistance

Egrants technical system assistance is available through the following options:

- An <u>Egrants User Guide</u> is posted on the Egrants page of the DOJ website. It covers Egrants registration through the full grant award instructions.
- Online Help is available in many areas of the Egrants program within the system, click on the Help Button.
- Egrants Helpdesk is staffed on non-holiday weekdays between 8AM and 4:30PM for system technical questions.

Email: Egrants@doj.state.wi.us Local calls: (608) 267-9068

Outside the 608 area code: (888) 894-6607 (toll free)

US Department of Justice/Office of Justice Programs Financial Guide

The guide should serve as a management tool for U.S Department of Justice award recipients and may also be used by sub-recipients in administering their grant program.

OMB Circulars/Code of Federal Regulations

This is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government.

Office of the Inspector General (OIG) Fraud Hotline

Grantees should report any allegations of fraud, waste, and abuse regarding grant funds to the U.S. Department of Justice, OCFO Customer Service Branch (CSB) via e-mail ask.ocfo@usdoj.gov and/or to the Office of the Inspector General (OIG) Fraud Hotline via e-mail oig.hotline@usdoj.gov or 1-800-869-4499.

Phone: 1-800-HHS-TIPS (11-800-447-8477)---Fax: 1-800-223-8164—TTY: 1-800-377-4950

G. Frequently Asked Questions

I. General Questions

Q1: I've submitted a G-2 fund request form. How soon can I expect payment?

A: DOJ processes grant payments on a reimbursement basis. The turnaround for payments is 30 days from the date DOJ receives the G-2. Payments may be delayed if the grantee has any delinquent progress reports, special conditions that haven't been cleared, missing original signatures, or if the G-2 form is filled out in error.

Q2: Where are the reporting forms found?

A: Reporting forms can be found electronically on DOJ's website (https://www.doj.state.wi.us/), and are located under specific program areas. They may also be found under the Resources section of this grant guide.

Q3: Can I email my progress and financial reports to DOJ?

A: Progress reports are done on-line in Egrants. G-2 Financial Reports, however, require original signatures and must be mailed to DOJ.

Q4: Why does my grant award amount not match what I applied for?

A: Some grant amounts may be lower than the amount applied for, due to such factors as availability of funds, allowability of items in the application budget, and general grant review decisions.

Q5: When does my grant become active?

A: A grant is considered official upon signing of acceptance by the sub-grantee and DOJ's receipt of the returned award document with all original signatures. Be aware of the start and end date printed on the award documents. Costs covered by the grant award must be incurred for services between these dates.

Q6: What do I do if implementation is delayed or equipment is backordered?

A: Contact DOJ staff to request an extension of the grant period, if available.

Q7: Am I required to send copies of invoices to DOJ with my financial reports?

A: Not all DOJ programs require sub-grantees to submit copies of expenditure details, but only to have it in their records and available for review at any time in case DOJ is audited or DOJ requests an audit.

Q8: What if I need to request a change to my approved award? (contact, budget, etc.)

A: To request a change to your approved award you will need to create a Modification. This can be completed in Egrants.

Q9: If required, where do I go to do my PMT reporting? How often is the report? What is it?

A: To access your PMT report please visit the following website, https://www.ojpsso.org/. These reports are done quarterly and data from these reports is used by the Bureau of Justice Assistance to collect data regarding the effectiveness of programs.

Q10: What is supplanting?

A: Supplanting means to deliberately reduce state or local funds because of the existence of federal funds. An example would be: when state funds are appropriated for a stated purpose and federal funds are awarded for that same purpose, the state replaces its state funds with federal funds, thereby reducing the total amount available for the stated purpose.

H. Glossary

1. Closeout

A process in which the awarding agency determines that all applicable administrative actions and all required work of the award have been completed by the recipient and the awarding agency.

2. Commingling of Funds

The accounting systems of all recipients must ensure that agency funds are not commingled with funds from other Federal agencies. Each award must be accounted for separately. Recipients are prohibited from commingling funds on either a program-by-program basis or a project-by-project basis. Funds specifically budgeted and/or received for one project may not be used to support another.

3. Consultant

An individual who provides professional advice or services.

4. Contracts

Entered into by recipients. With the exception of a few justified sole source situations, contracts are awarded via competitive processes to procure a good or service.

5. Equipment

Tangible non-expendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

6. Expenditure of Funds

Funds which have been properly obligated by the end of the award period will have 60 days in which to be liquidated (expended). Any funds not liquidated at the end of the 60-day period will lapse and revert to DOJ.

7. F.T.E. (Full-Time Equivalent)

A percentage of time an employee works, compared to a full-time staff person. For example, if a full-time employee works 40 hours per week (1.0 FTE), a person who works 20 hours per week is a .50 FTE employee.

8. Grants

Are awarded to states, units of local government, or private organizations at the discretion of the awarding agency or on the basis of a formula. Grants are used to support a public purpose.

9. Indirect Costs

Are costs of an organization that are not readily assignable to a particular project, but are necessary to the operation of the organization and the performance of the project.

10. Match

Is the recipient share of the project costs. Match may either be "in-kind" or "cash." In-kind match includes the value of donated services. Cash match includes actual cash spent by the recipient.

11. Modification

Request for programmatic and/or adminstrative budget changes.

12. Obligation of Funds

Occurs when funds are encumbered on a valid purchase order or requisition to cover the cost of purchasing an authorized item on or after the beginning date and up to the last day of the grant period in the award. Any funds not properly obligated by the recipient within the award period will lapse and revert to DOJ. The obligation deadline is the last day of the award period.

13. Program Income

Gross income earned by the recipient, during the funding period, as a direct result of the award. Direct result is defined as a specific act or set of activities that are directly attributable to grant funds and which are directly related to the goals and objectives of the project.

14. Purchase of Evidence (P/E)

The purchase of evidence and/or contraband, such as narcotics and dangerous drugs, firearms, stolen property, counterfeit tax stamps, etc., required to determine the existence of a crime or to establish the identity of a participant in a crime.

15. Purchase of Service (P/S)

Includes travel or transportation of a non-Federal officer or an informant; the lease of an apartment, business front, luxury-type automobiles, aircraft or boat, or similar effects to create or establish the appearance of affluence; and/or meals, beverages, entertainment, and similar expenses (including buy money and flash roll, etc.) for undercover purposes, within reasonable limits.

16. Purchase of Specific information (P/I)

Includes the payment of monies to an informant for specific information. All other informant expenses would be classified under P/S and charged accordingly.

17. Supplanting

Means to deliberately reduce state or local funds because of the existence of federal funds. An example would be: when state funds are appropriated for a stated purpose and federal funds are awarded for that same purpose, the state replaces its state funds with federal funds, thereby reducing the total amount available for the stated purpose.

18. Supplemental Awards

The addition of funds to an existing award to support new or additional activities not identified in the original grant, support an expansion of approved grant activities, or provide for an increase in costs due to unforeseen circumstances.

I. Appendix



BRAD D. SCHIMEL ATTORNEY GENERAL

Paul W. Connell Deputy Attorney General

Delanie M. Breuer Chief of Staff 114 East, State Capitol P.O. Box 7857 Madison, WI 53707-7857 608/266-1221 TTY 1-800-947-3529

December 29, 2016

John Smith, Substance Abuse Services Manager ABC County Department of Human Services 123 Park Street Madison, WI 53704-2020

RE: Inreach and Treatment for Opiate Offenders DOJ Grant Number: 2015-RS-01-20000

Dear Mr. Smith:

The Wisconsin Department of Justice, Division of Law Enforcement Services has approved a grant award to ABC County in the amount of \$100,000 which includes your local match amount. These funds are from DOJ's Residential Substance Abuse Treatment Program available through the US Department of Justice. This grant supports ABC County's "Inreach and Treatment for Opiate Offenders Program."

To accept this award, have the authorized official sign the Signatory Page, Certified Assurances and Lobbying and Debarment Forms in addition to initialing the bottom right corner of Attachment A. The project director should sign the acknowledgement notice. One of the two award packets enclosed should be returned to DOJ within 30 days. The other should be maintained for your records. Funds cannot be released until all signed documents are received.

As project director, you will be responsible for all reporting requirements outlined in the grant award and seeing that funds are administered according to the approved application materials and certifications. Please refer to the FAQ sheet enclosed for contact information and grant guidelines. We look forward to a collaborative working relationship with you.

Very truly yours,

BRAD D. SCHIMEL Attorney General



BRAD D. SCHIMEL ATTORNEY GENERAL

Andrew C. Cook Deputy Attorney General 114 East, State Capitol P.O. Box 7857 Madison, WI 53707-7857 608/266-1221 TTY 1-800-947-3529

RESIDENTIAL SUBSTANCE ABUSE AND TREATMENT PROGRAM

Inreach and Treatment for Opiate Offenders 2015-RS-01-20000

The Wisconsin Department of Justice (DOJ), hereby awards to **ABC County**, (hereinafter referred to as the **Grantee**), the amount of **\$100,000** for programs or projects pursuant to the federal Violent Crime Control and Law Enforcement Act of 1994.

This grant may be used until **December 31, 2016** for the programs consistent with the budget and general conditions in Attachment A, subject to any limitations or conditions set forth in Attachments B and/or C, if included.

The Grantee shall administer the programs or projects for which this grant is awarded in accordance with the applicable rules, regulations, and conditions of the Wisconsin Department of Justice. The submitted application is hereby incorporated as reference into this award.

This grant shall become effective, and funds may be obligated (unless otherwise specified in Attachments A and/or B) when the Grantee signs and returns one copy of this grant award to the Wisconsin Department of Justice.

В	Y:
	BRAD D. SCHIMEI Attorney Genera
	Wisconsin Department of Justice
12/29/2015	
Date	
The (Grantee), ABC County , hereby signifies its acceptance of the above-dabove or incorporated by reference therein.	lescribed grant on the terms and conditions set forth
GRANTEE:	ABC County
BY:	
NAME:	Joe Anderson
TITLE:	County Executive
Date	

RESIDENTIAL SUBSTANCE ABUSE AND TREATMENT PROGRAM ATTACHMENT A

Grantee: ABC County							
Project Title:	Inreach and Treatment for Opiate Offenders	······	CFDA #16.593				
Grant Period:	From January 1, 2016	To December 31, 2016					
Grant Number:	2015-RS-01-20000	Program Area:	01				

APPROVED BUDGET

See your Egrants Application for details

	Federal & Match			
Personnel				
Employee Benefits				
Travel (Including Training)				
Equipment				
Supplies & Operating Expenses				
Consultants	\$100,000			
Other				
FEDERAL TOTAL	\$75,000			
MATCH TOTAL	\$25,000			
TOTAL APPROVED BUDGET	\$100,000			

Award General Conditions:

- 1. The Residential Substance Abuse Treatment program requires a 25% cash match. Recipient agencies may contribute more than the 25% match if they so choose.
- 2. Award funds will be used to supplement, not supplant, planned or allocated funds.
- 3. All funds (federal and cash match) must be obligated (purchase order issued) within the grant period.
- 4. Budget changes in excess of 10% of the approved line item amount and **any** increases for personnel compensation not included in the approved budget require approval from DOJ. **All changes to the contractual category require prior DOJ approval.**
- 5. Subgrantees acknowledge that failure to submit an acceptable Equal Employment Opportunity Plan (if required to submit one pursuant to 28 CFR 42.302) that is approved by the Federal Office of Civil Rights, is a violation of its Certified Assurances and may result in the suspension of the grant.
- 6. Grant funds will be paid to the grantee on a reimbursement basis.
- 7. Any changes in personnel involved with the grant including the project director, financial officer and/or signatory needs to be reported in a modification to DOJ via Egrants.
- 8. Fees for independent consultants may not exceed the federal rate of \$650 per eight-hour day, unless prior approval is received from DOJ. Reimbursement for travel (i.e. mileage, meals, and lodging) is limited to state rates.

9.

- 10. All income generated as a direct result of an agency funded project shall be deemed program income. Program income must be used for the purpose and under the conditions applicable to the award. Program income should be used as earned and expended as soon as possible. If the cost is allowable under the Federal grant program, then the cost would be allowable using program income. All program income must be reported to DOJ.
- 11. All contracts pertaining to this grant must be submitted to DOJ within 30 days of receipt of grant award documents.

 Recipient fully understands that DOJ has the right to suspend or terminate grant funds to any recipient that fails to conform to the
- 12. requirements (special/general conditions and general operating policies) or that fails to comply with the terms and conditions of its grant award.
- 13. All awards are subject to the availability of appropriated funds and to any modifications or additional requirements that may be imposed by law.
- 14. The Wisconsin Department of Justice reserves the right to withhold grant payments if the grant recipient is delinquent paying any obligation to the Department of Justice such as background check fees, etc.
- 15. 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 Wisconsin Department of Justice (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.

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.

				Date	December 2016
Grant	ee: ABC	County		Grant No.	2015-RS-01-20000
Projec	ct Title: I	nreach and T	reatment for Opiate Offender	rs	
The fo	llowing rep	orting require	ments apply to your grant award	d.	
	must be c	ompleted in to on on this syste	DRMANCE MEASURE REPORT the federal web-based Perform and instructions will be provedue in the PMT on:	nance Measurement	Tool (PMT). Additional
	4/12/2	2016	07/12/2016	10/12/2016	1/12/2017 FINAL
-	NOTE:	Reports due Reports due	04/12 includes January, Februar 07/12 includes April, May and J 10/12 includes July, August and 01/12 includes October, Novem	June program activity. I September program a	activity.
	completed	l in Egrants.	GRESS REPORTS must be su Narrative reports on the status		
-	07/12/	2016	1/30/2017 FINAL		
	NOTE:		07/12 includes January, Februar 01/12 includes July, August, Se		and June program activity. vember and December program
	Report (G website, u	2) form can be	rs serve two functions: to report found on the DOJ website:		

ACKNOWLEDGEMENT

The materials referenced above were received and reviewed by the appropriate members of this organization. I also acknowledge receipt of the Grant Award and any attached Special Conditions, as well as receipt of the General Conditions which were previously provided in the Instructions for Filing and Application. I understand that this grant is awarded subject to our compliance with all Conditions, Regulations, and Obligations described in the above materials.

		, Project Director
Date	John Smith	

U.S. DEPARTMENT OF JUSTICE OFFICE OF JUSTICE PROGRAMS OFFICE OF THE CHIEF FINANCIAL OFFICER

CERTIFICATIONS REGARDING LOBBYING; DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS; AND DRUG-FREE WORKPLACE REQUIREMENTS

Applicants should refer to the regulations cited below to determine the certification to which they are required to attest. Applicants should also review the instructions for certification included in the regulations before completing this form. Acceptance of this form provides for compliance with certification requirements under 28 CFR Part 69, "New Restrictions on Lobbying," 2 CFR Part 2867, "DOJ Implementation of OMB Guidance on Nonprocurement Debarment and Suspension," and 28 CFR Part 83, "Government-wide Debarment and Suspension," and Government-wide Requirements for Drug-Free Workplace (Grants)." 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 transaction, grant, or cooperative agreement.

- 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)

Pursuant to Executive Order 12549, Debarment and Suspension, implemented at 2 CFR Part 2867, for prospective participants in primary covered transactions, as defined at 2 CFR Section 2867.20(a), and other requirements:

- A. The applicant certifies that it and its principals:
- (a) 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;
- (b) 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;
- (c) Have not within a two-year period preceding this application been convicted of a felony criminal violation under any Federal law, unless such felony criminal conviction has been disclosed in writing to the Office of Justice Programs (OJP) at Ojpcompliancereporting@usdoj.gov, and, after such disclosure, the applicant has received a specific written determination from OJP that neither suspension nor debarment of the applicant is necessary to protect the interests of the Government in this case.

- (d) 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 (b) of this certification; and
- (e) 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.
- 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. FEDERAL TAXES

- A. If the applicant is a corporation, the applicant certifies that either (1) the corporation has no unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability, or (2) the corporation has provided written notice of such an unpaid tax liability (or liabilities) to OJP at Ojpcompliancereporting@usdoj.gov, and, after such disclosure, the applicant has received a specific written determination from OJP that neither suspension nor debarment of the applicant is necessary to protect the interests of the Government in this case.
- 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.
- 4. DRUG-FREE WORKPLACE (GRANTEES OTHER THAN INDIVIDUALS)

As required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 83, Subpart F, for grantees, as defined at 28 CFR Sections 83.620 and 83.650:

- A. The applicant certifies that it will or will continue to provide a drug-free workplace by:
- (a) 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;
- (b) Establishing an on-going drug-free awareness program to inform employees about
- (1) The dangers of drug abuse in the workplace:
- (2) The grantee's policy of maintaining a drug-free workplace;
- (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
- (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) 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 (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will
- (1) Abide by the terms of the statement; and
- (2) 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;

- (e) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to: Department of Justice, Office of Justice Programs, ATTN: Control Desk, 810 7th Street, N.W., Washington, D.C. 20531. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted
- (1) 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
- (2) 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;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the above certifications.

ABC County Department of Human Services, 123 Park Street, Madison, Wisconsin, 53704-2020
Grantee Name and Address
Inreach and Treatment for Opiate Offenders
Project Name

Joe Anderson, County Executive Signature of Chief Executive (Co. Board Chair, Co. Executive, Mayor)

CERTIFIED ASSURANCES RESIDENTIAL SUBSTANCE ABUCE AND TREATMENT PROGRAM Updated as of 3-1-16

FEDERAL ASSURANCES

The Applicant hereby assures and certifies compliance with all applicable Federal statutes, regulations, policies, guidelines, and requirements, including OMB Circulars A-21, A-87, A-102, A-110, A-122, A-133; Ex. Order 12372 (intergovernmental review of federal programs); and 28 C.F.R. pts. 66 or 70 (administrative requirements for grants and cooperative agreements). The applicant also specifically assures and certifies that:

- 1. It has the legal authority to apply for federal assistance and the institutional, managerial, and financial capability (including funds sufficient to pay any required non-federal share of project cost) to ensure proper planning, management, and completion of the project described in this application.
- 2. It will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- 3. It will give the awarding agency or the General Accounting Office, through any authorized representative, access to and the right to examine all paper or electronic records related to the financial assistance.
- 4. It will comply with all lawful requirements imposed by the awarding agency, specifically including any applicable regulations, such as 28 C.F.R. pts. 18, 22, 23, 30, 35, 38, 42, 61, and 63, and the award term in 2 C.F.R. § 175.15(b).
- 5. It will assist the awarding agency (if necessary) in assuring compliance with section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. § 470), Ex. Order 11593 (identification and protection of historic properties), the Archeological and Historical Preservation Act of 1974 (16 U.S.C. § 469 a-1 et seq.), and the National Environmental Policy Act of 1969 (42 U.S.C. § 4321).
- 6. It will comply (and will require any subgrantees or contractors to comply) with any applicable statutorily-imposed nondiscrimination requirements, which may include the Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. § 3789d); the Victims of Crime Act (42 U.S.C. § 10604(e)); The Juvenile Justice and Delinquency Prevention Act of 2002 (42 U.S.C. § 5672(b)); the Civil Rights Act of 1964 (42 U.S.C. § 2000d); the Rehabilitation Act of 1973 (29 U.S.C. § 7 94); the Americans with Disabilities Act of 1990 (42 U.S.C. § 12131-34); the Education Amendments of 1972 (20 U.S.C. §§1681, 1683, 1685-86); and the Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-07); see Ex. Order 13279 (equal protection of the laws for faith-based and community organizations).
- 7. If a governmental entity: it will comply with the requirements of the Uniform Relocation Assistance and Real Property Acquisitions Act of 1970 (42 U.S.C. § 4601 et seq.), which govern the treatment of persons displaced as a result of federal and federally-assisted programs; and it will comply with requirements of 5 U.S.C. §§ 1501-08 and §§ 7324-28, which limit certain political activities of State or local government employees whose principal employment is in connection with an activity financed in whole or in part by federal assistance.

FEDERAL AWARD CONDITIONS

- 1. The recipient agrees to comply with the financial and administrative requirements set forth in the current edition of the Office of Justice Programs (OJP) Financial Guide.
- 2. The recipient acknowledges that failure to submit an acceptable Equal Employment Opportunity Plan (if recipient is required to submit one pursuant to 28 C.F.R. Section 42.302), that is approved by the Office for Civil Rights, is a violation of its Standard Assurances executed by the recipient, and may result in suspension of funding until such time as the recipient is in compliance, or termination of award.
- 3. The recipient agrees to comply with the organizational audit requirements of OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, and further understands and agrees that funds may be withheld, or other related

requirements may be imposed, if outstanding audit issues (if any) from OMB Circular A-133 audits (and any other audits of OJP grant funds) are not satisfactorily and promptly addressed, as further described in the current edition of the OJP Financial Guide.

- 4. Recipient understands and agrees that it cannot use any federal funds, either directly or indirectly, in support of the enactment, repeal, modification or adoption of any law, regulation or policy, at any level of government, without the express prior written approval of OJP.
- 5. The recipient must promptly refer to the DOJ OIG any credible evidence that a principal, employee, agent, contractor, sub grantee, subcontractor, or other person has either I) submitted a false claim for grant funds under the False Claims Act; or 2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving grant funds. This condition also applies to any subrecipients. Potential fraud, waste, abuse, or misconduct should be reported to the OIG by

mail:

Office of the Inspector General U.S. Department of Justice Investigations Division 950 Pennsylvania Avenue, N.W. Room 4706 Washington, DC 20530

e-mail: oig.hotline@usdoj.gov .

hotline: (contact information in English and Spanish): (800) 869-4499 or hotline fax: (202)616-9881

Additional information is available from the DOI OIG website at www.usdoj.gov/oig.

6. Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient under this award, or entity that receives a contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to received such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

- 1. In accepting this award, the recipient
 - a.Represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and
 - b. Certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.
- 2. If the recipient does or is authorized to make subawards or contracts under this award
 - a.It represents that -
 - (1) It has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subbaward, contact, or subcontract) either requires or has required internal confidentiality agreements or statements from employees or contactors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and
 - (2) It has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

- b. It certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements of statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.
- 7. Recipient understands and agrees that it cannot use any federal funds, either directly or indirectly, in support of any contract or subaward to either the Association of Community Organizations for Reform Now (ACORN) or its subsidiaries, without the express prior written approval of OJP.
- 8. The recipient agrees to comply with any additional requirements that may be imposed during the grant performance period if the agency determines that the recipient is a high-risk grantee. Cf. 28 C.F.R. parts 66, 70.
- 9. The recipient agrees to comply with applicable requirements regarding registration with the System for Award Management (SAM) (or with a successor government-wide system officially designated by OMB and OJP). The recipient also agrees to comply with applicable restrictions on subawards to first-tier subrecipients that do not acquire and provide a Data Universal Numbering System (DUNS) number. The details of recipient obligations are posted on the Office of Justice Programs web site at http://www.ojp.gov/funding/sam/htm (Award condition: Registration with the System for Award Management and Universal Identifier Requirements), and are incorporated by reference here. This special condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).
- 10. Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), the Department encourages recipients and sub recipients to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this grant, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted divers.
- 11. The recipient agrees to comply with all applicable laws, regulations, policies, and guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences, meetings, trainings, and other events, including the provision of food and/or beverages at such events, and costs of attendance at such events. Information on rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "2015 DOJ Grants Financial Guide").
- 12. The recipient understands and agrees that any training or training materials developed or delivered with funding provided under this award must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at http://ojp.usdoj.gov/funding/ojptrainingguidingprinciples.htm.
- 13. The recipient agrees that if it currently has an open award of federal funds or if it receives an award of federal funds other than this OJP award, and those award funds have been, are being, or are to be used, in whole or in part, for one of more of the identical cost items for which funds are being provided under this OJP award, the recipient will promptly notify, in writing, the grant manager for this OJP award, and, if so requested by OJP, seek a budget-modification or change-of-project-scope grant adjustment notice (GAN) to eliminate any inappropriate duplication of funding.
- 14. The recipient understands and agrees that award funds may not be used to discriminate against or denigrate the religious or moral beliefs of students who participate in programs for which financial assistance is provided from those funds, or the parents or legal guardians of such students.
- 15. The recipient understands and agrees that (a) No award funds may be used to maintain or establish a computer network unless such network blocks the viewing, downloading, and exchanging of pornography, and (b) Nothing in subsection (a) limits the use of funds necessary for any Federal, State, tribal, or local law enforcement agency or any other entity carrying out criminal investigations, prosecution, or adjudication activities.
- 16. A recipient that is eligible under the Part 200 Uniform Requirements to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC).

- 17. The recipient must collect, maintain, and provide to OJP, data that measure the performance and effectiveness of activities under this award, in the manner, and within the timeframes, specified in the program solicitation, or as otherwise specified by OJP. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act, and other applicable laws.
- 18. The recipient agrees to comply with OJP grant monitoring guidelines, protocols, and procedures, and to cooperate with BJA and OCFO on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits. The recipient agrees to provide to BJA and OCFO all documentation necessary to complete monitoring tasks, including documentation related to any subawards made under this award. Further, the recipient agrees to abide by reasonable deadlines set by BJA and OCFO for providing the requested documents. Failure to cooperate with BJS's/OCFO's grant monitoring activities may result in sanctions affecting the recipient's DOJ awards, including, but not limited to: withholdings and/or other restrictions on the recipient's access to grant funds; referral to the Office of the Inspector General for audit review; designation of the recipient as a DOJ High Risk grantee; or termination of an award(s).
- 19. The recipient agrees that federal funds under this award will be used to supplement but not supplant state or local funds.
- 20. The State/Territory (State) will coordinate the design and implementation of treatment programs between State correctional representatives and the State alcohol and drug abuse agency (and, if appropriate, between representatives of local correctional agencies and representatives of either the State alcohol and drug abuse agency or any appropriate local alcohol and drug abuse agency, especially where there is opportunity to coordinate with initiatives funded through the Justice Assistance Grant (JAG) program).
- 21. The recipient agrees that grant funds may be used to pay for data collection, analysis, and report preparation only if that activity is associated with federal reporting requirements. Other data collection, analysis, and evaluation activities are not allowable uses of grant funds.
- 22. The State/Territory (State) will implement or continue to require urinalysis or other proven reliable forms of testing of individuals in correctional residential substance abuse treatment programs. Such testing shall include individuals released from residential substance abuse treatment programs who remain in the custody of the State.
- 23. The recipient acknowledges that all programs funded through subawards, whether at the state or local levels, must conform to the grant program requirements as stated in BJA program guidance.
- 27. Approval of this award does not indicate approval of any consultant rate in excess of \$650 per day. A detailed justification must be submitted to and approved by the Office of Justice Programs (OJP) program office prior to obligation or expenditure of such funds.
- 28. All procurement (contract) transactions under this award must be conducted in a manner that is consistent with applicable Federal and State law, and with Federal procurement standards specified in regulations governing Federal awards to non-Federal entities. Procurement (contract) transactions should be competitively awarded unless circumstances preclude competition. Noncompetitive (e.g., sole sourse) procurements by the award recipient in excess of the Simplified Acquisition Threshold (currently (150,000) set out in the Federal Acquisition Regulation must receive prior approval from the awarding agency, and must otherwise comply with rules governing such procurements found in the current edition of the OJP Financial Guide.
- 29. The recipient agrees to submit to BJA for review and approval any curricula, training materials, proposed publications, reports, or any other written materials that will be published, including web-based materials and web site content, through funds from this grant at least thirty (30) working days prior to the targeted dissemination date. Any written, visual, or audio publications, with the exception of press releases, whether published at the grantee's or government's expense, shall contain the following statements: "This project was supported by Grant No. 2015-RT-BX-0052 awarded by the Bureau of Justice Assistance. The Bureau of Justice Assistance is a component of the Department of Justice's Office of Justice Programs, which also includes the Bureau of Justice Statistics, the National Institute of Justice, the Office of Juvenile Justice and Delinquency Prevention, the office for Victims of Crime, and the SMART Office. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." The current edition of the OJP Financial Guide provides guidance on allowable printing and publication activities.

CIVIL RIGHTS/NONDISCRIMINATION PROVISIONS:

- 1. Recipient will comply (and will require any subgrantees or contractors to comply) with any applicable statutorily-imposed nondiscrimination requirements, which may include the Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. § 3789d); the Victims of Crime Act (42 U.S.C. § 10604(e)); The Juvenile Justice and Delinquency Prevention Act of 2002 (42 U.S.C. § 5672(b)); the Civil Rights Act of 1964 (42 U.S.C. § 2000d); the Rehabilitation Act of 1973 (29 U.S.C. § 794); the Americans with Disabilities Act of 1990 (42 U.S.C. § 12131-34); the Education Amendments of 1972 (20 U.S.C. §§1681, 1683, 1685-86); and the Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-07); 28 C.F.R. pt. 31 (U.S. Department of Justice Regulations –OJJDP Grant Programs); 28 C.F.R. pt. 42 (U.S. Department of Justice Regulations Nondiscrimination; Equal Employment Opportunity; Policies and Procedures); see Ex. Order 13279 (equal protection of the laws for faith-based and community organizations); and 28 C.F.R. pt. 38 (U.S. Department of Justice Regulations Equal Treatment for Faith-Based Organizations).
- 2. In the event a Federal or State court or Federal or State administrative agency makes a finding of discrimination after a due process hearing on the grounds of race, color, religion, national origin, or sex against a recipient of funds, the recipient will forward a copy of the findings to the Department of Justice (DOJ).
- 3. Recipient will provide an Equal Employment Opportunity Plan (EEOP) to the Office for Civil Rights, Office of Justice Programs and the DOJ, if required to submit one; otherwise, it will provide a certification to the Office for Civil Rights, Office of Justice Programs and the DOJ that it has a current EEOP on file, if required to maintain one. For grantee agencies receiving less than \$25,000, or grantee agencies with less than 50 employees, regardless of the amount of the award, no EEOP is required. Information about civil rights obligations of grantees can be found at http://www.ojp.usdoj.gov/ocr/.
- 4. The recipient acknowledges that failure to submit an acceptable Equal Employment Opportunity Plan (if recipient is required to submit one pursuant to 28 C.F.R. Section 42.302), that is approved by the Office for Civil Rights, is a violation of its Certified Assurances and may result in suspension or termination of funding, until such time as the recipient is in compliance.
- 5. As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with the Omnibus Crime Control and Safe Streets Act of 1968 and Title VI of the Civil Rights Act of 1964, recipient must take reasonable steps to ensure that LEP persons have meaningful access to its programs. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Recipient is encouraged to consider the need for language services for LEP persons served or encountered both in developing its budgets and in conducting its programs and activities. Additional assistance and information regarding your LEP obligations can be found at http://www.lep.gov.
- 6. In accordance with federal civil rights laws, the subrecipient shall not retaliate against individuals for taking action or participating in action to secure rights protected by these laws.

CERTIFICATION		
Lead Agency's Chief Executive: I certify that applicant will comply with the	above-certified assurances	
Ecua rigoney's ciner Executive. I coming that applicant will comply with the	above certified apparatices.	
	-	
Signature of Chief Executive (Co. Board Chair, Co. Executive, Mayor)	Date	
Joe Anderson, County Executive		
<u> </u>	Telephone Number	

Instructions for Completing Form G-2 Financial Reporting and Funds Request Form

REPORT HEADING INFORMATION

GRANTEE NAME: Enter the grantee agency name as shown on the grant award document (e.g., Sauk County).

REPORT PERIOD: Enter period for which actual expenditures are being reported. Refer to Acknowledgement Notice for specific report due dates.

GRANT NUMBER: Enter the grant number assigned on Attachment A of the grant award document.

PROJECT TITLE: Enter project title (e.g., Comprehensive Jail Removal Planning, In-Home Detention).

GRANT PERIOD: Enter the grant period as shown on Attachment A of the award document. If the grant period has been adjusted by OJA, use the new dates.

IS THIS THE FINAL REPORT FOR THIS GRANT?: if 'Yes' then this completed form must be returned to OJA no later than 30 days after the project period end date to be eligible for project reimbursement.

PART I. EXPENSES - To be allowable under a grant program, costs must be paid or obligated for services provided during the grant period. If obligated by the end of the grant period, payment must be made within 30 days of the grant period ending date. Columns are numbered at the top. Each category's expenditures and balance should be reported as of the end of the current period.

COLUMN 1. FEDERAL CURRENT EXPENSES: Record amounts for which cash has been disbursed or vouchered for this report period (not including match).

COLUMN 2. FEDERAL EXPENSES TO DATE: The amounts in column 1 of current report should be added to the amounts in column 2 of the prior period's report. Enter the total in this column. This column represents the total paid or vouchered expenses to date.

COLUMN 3. MATCH EXPENSES TO DATE: This column represents the total MATCH expenses paid to date.

COLUMN 4. EXPENSES TO DATE INCLUDING MATCH: This column is the total federal and match expenses to date. It is the sum of column 2 and 3.

COLUMN 5. APPROVED BUDGET: These are the approved budget categories from Attachment A of your grant award or subsequent Grant Adjustment Notices received from OJA. Line item transfers in excess of 10% of an approved line item require specific written approval from OJA prior to expenditure or obligation. All changes in Personnel or Contractual require prior approval from OJA.

COLUMN 6. BALANCE: Subtract the total of the amounts in column 4 from column 5. Enter the result in column 6.

PART II. FUNDS REPORT AND REQUEST

RECEIVED TO DATE: Enter the total amount of federal funds received to date from OJA (based on your previous submissions).

NOW REQUESTED: Enter the amount of federal funds now requested. This amount will be based upon actual paid expenses. OJA will analyze the fund request and release funds if the request is reasonable.

PART III. PROGRAM INCOME (complete only if applicable) - Program income means gross income earned as a <u>direct result</u> of the OJA grant award. The program income must be used to further program objectives.

CURRENT REPORT PERIOD: Enter the program income earned and expended during the report period.

TO DATE: Enter the total program income earned and expended to date (including current report period).

PERSON RESPONSIBLE FOR G-2 COMPLETION: Enter name and telephone number of the person who completed the G-2.

PART IV. GRANTEE CERTIFICATION: This report must be signed and dated by both the Project Director and the Financial Officer of the project.

Completion of this form is required by SS. 16.964 Wis. Stats.

Failure to comply could result in suspension of funding and/or disallowance of incurred costs.

FINANCIAL REPORT/FUND REQUEST (G-2)

Statute 16.964

WISCONSIN DEPARTMENT OF JUSTICE TRAINING & STANDARDS BUREAU 17 W. MAIN ST. PO BOX 7070 MADISON, WI 53707-7070

CEE INCTRUCTIO	Ne ON DEVEDEE	eine perone co	PO BOX 7070 MADISON, WI 53707-7070					
GRANTEE NAME (AS SHOWN ON GRANT AWAI REPORT					GRANT NUMBER			
PROJECT TITLE	<u> </u>		GRANT PERIOD	GRANT PERIOD				
IS THIS THE FIN	AL REPORT FOR	THIS GRANT?	T YES	V NO				
PART I: EXPENS	SES - REPORT AC	TUAL EXPENSES	5					
BUDGET CATEGORIES CURRENT EXPENSES TO DATE DATE		(2 + 3) EXPENSES TO	5 APPROVED BUDGET INCLUDING MATCH	6 BALANCE				
PERSONNEL		0.00	0.00	0.00	0.00	0.00	0.00	
EMPLOYEE BENE	FITS	0.00	0.00	0.00	0.00	0.00	0.00	
TRAVEL/TRAININ	IG	0.00	0.00	0.00	0.00	0.00	0.00	
EQUIPMENT		0.00	0.00	0.00	0.00	0.00	0.00	
SUPPLIES/OPERATING		0.00	0.00	0.00	0.00	0.00	0.00	
CONSULTANTS/CONTRACTUAL		0.00	0.00	0.00	0.00	0.00	0.00	
OTHER		0.00	0.00	0.00	0.00	0.00	0.00	
TOTAL		0.00	0.00	0.00	0.00	0.00	0.00	
PART II: FUNDS	REPORT AND RE	QUEST		PART III: PROC	GRAM INCOME			
	RECEIVED TO DATE	NO₩ REQUESTED				CURRENT PERIOD	TO DATE	
FED/OR STATE FUNDS	0.00	0.00		EARNED		0.00	0.00	
				EXPENDED		0.00	0.00	
PERSON/TELEPH FOR G-2 COMPL		SPONSIBLE		FOR DOJ OFFIC	E USE ONLY:	CODE		
NAME:		TELEPHONE		DATE VOUCHERED		vo#		
				CONDITIONS: YES NO				

PART IV: GRANTEE CERTIFICATION

CERTIFY THAT THE ABOVE REPORT IS COMPLETE AND THAT ALL INFORMATION IS CONTAINED IN THE PERMANENT FISCAL RECORDS OF MY ORGANIZATION.

ORIGINAL SIGNATURESOF BOTH THE PROJECT DIRECTOR AND FINANCIAL OFFICER MUST BE PROVIDED.

SIGNATURE OF PROJECT DIRECTOR DATE SIGNATURE OF FINANCIAL OFFICER DATE

FINANCIAL REPORT/FUND REQUEST (G-2)

Statute 16.964

WISCONSIN DEPARTMENT OF JUSTICE TRAINING & STANDARDS BUREAU 17 W. MAIN ST. PO BOX 7070 MADISON, WI 53707-7070

SEE INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING FORM							
GRANTEE NAME (AS SHOWN ON GRANT AWARD) REPORT PERIOD		D	GRANT NUMBER				
ABC County			7/1/16 - 9/30/16 2015-RS-01-20000			00	
PROJECT TITLE		-1- 0#1	GRANT PERIOD				
Inreach & Trea	atment for Opi			12/31/2016 √ NO			
				Ŭ NO			
PART I: EXPEN	SES - REPORT A	CTUAL EXPENS		2	4		
BUDGET CA	TEGORIES	FED/OR STATE CURRENT EXPENSES	FED/OR STATE EXPENSES TO DATE	3 MATCH EXPENSES TO DATE (IF REQUIRED)	4 (2 + 3) EXPENSES TO DATE INCLUDING	5 APPROVED BUDGET INCLUDING MATCH	BALANCE
PERSONNEL		0.00	0.00	0.00	0.00	0.00	0.00
EMPLOYEE BEN	EFITS	0.00	0.00	0.00	0.00	0.00	0.00
TRAVEL/TRAININ	I G	0.00	0.00	0.00	0.00	0.00	0.00
EQUIPMENT		0.00	0.00	0.00	0.00	0.00	0.00
SUPPLIES/OPER	ATING	0.00	0.00	0.00	0.00	0.00	0.00
CONSULTANTS/CONTRACTUAL 15,00		15,000.00	30,000.00	10,000.00	40,000.00	100,000.00	60,000.00
OTHER 0.00		0.00	0.00	0.00	0.00	0.00	
TOTAL	OTAL 15,000.00 30,000.00 10,000.00 40,000.00 100,000.00 60		60,000.00				
PART II: FUNDS REPORT AND REQUEST			PART III: PRO	GRAM INCOME			
	RECEIVED TO DATE	NOW REQUESTED				CURRENT PERIOD	TO DATE
FED/OR STATE FUNDS	15,000.00	15,000.00		EARNED		0.00	0.00
				EXPENDED		0.00	0.00
			ı				
PERSON/TELEPHONE NUMBER RESPONSIBLE			FOR DOJ OFFIC				
FOR G-2 COMPLETION: NAME: TELEPHONE AMOUNT VOUCHEREDCODE							
DATE		DATE VOUCHERED VO#					
Fiscal Person 608-222-2222				CONDITIONS:	YES NO		
PART IV: GRANTEE CERTIFICATION I CERTIFY THAT THE ABOVE REPORT IS COMPLETE AND THAT ALL INFORMATION IS CONTAINED IN THE PERMANENT FISCAL RECORDS OF MY ORGANIZATION. ORIGINAL SIGNATURES OF BOTH THE PROJECT DIRECTOR AND FINANCIAL OFFICER MUST BE PROVIDED.							
SIGNATURE OF	PROJECT DIREC	TOR DA	ATE	SIGNATU	IRE OF FINANCIA	L OFFICER	DATE